



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: April 22, 2009

RE: Ditto Sales, Inc. / 037-27593-00083

FROM: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

## Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from 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  
FNPER-AM.dot12/3/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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April 22, 2009

Mr. Jeff Jahn  
Ditto Sales  
P.O. Box 850  
Jasper, IN 47547

Re: Exempt Construction and Operation Status,  
037-27593-00083

Dear Mr. Jahn,

The application from Dittos Sales, received on March 5, 2009, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary metal and wood furniture manufacturing facility located at 2332 Cathy Lane and 267 30th Street, Jasper, IN 47546 and is classified as exempt from air pollution permit requirements.

This source consists of two plants:

- (a) Plant A is located at 2332 Cathy Lane, Jasper IN 47546
- (b) Plant B is located at 267 30th Street, Jasper IN 47546

Since the two (2) plants are located less than 1.0 miles apart on adjacent properties, have the same two-digit Standard Industrial Classification (SIC) Code of 25 (Furniture and Fixtures), Plant B is a support facility of Plant A, and both plants are under common control of Ditto Sales, they will be considered one (1) source, effective from the date of issuance of this exemption.

The source consists of the following existing emission unit(s):

**Ditto Sales - 2332 Cathy Lane, Jasper, Indiana**

- (a) One (1) powder coating operation, identified as Powder, constructed in 2007, applying coatings to metal furniture via HDLV powder spray equipment, with a maximum capacity of 150 units per hour, using dust collectors DC21 and DC22 as particulate control, and exhausting within the building.
- (b) One (1) woodworking operation, identified as WW1, with units constructed in 1995, 1998, 2004, and 2007, with a maximum throughput rate of 50 units per hour, using dust collectors DC3 through DC6 as particulate control, exhausting within the building, and consisting of:
  - (1) Six (6) CNC edge banders; and
  - (2) One (1) CNC router.
- (c) One (1) buffing operation, identified as Buffing, constructed in 1999, with a maximum capacity of 250 units per hour, using dust collector DC20 as particulate control, exhausting within the building, and consisting of:
  - (1) Three (3) backstand polishers; and
  - (2) Two (2) table polishers.

- (d) One (1) machining operation, identified as Mach OP 1, constructed in 2003, with a maximum capacity of 400 units per hour, using dust collector DC1 particulate control, exhausting within the building, and consisting of:
  - (1) Two (2) lasers.
- (e) One (1) machining operation, identified as Mach OP 2, constructed in 2005, with a maximum capacity of 100 units per hour, using dust collector DC2 as particulate control, exhausting within the building, and consisting of:
  - (1) One (1) cutoff saw; and
  - (2) One (1) shaper.
- (f) One (1) welding operation, using less than six hundred twenty-five (625) pounds of weld wire per day, utilizing dust collectors DC7 through DC19 as particulate control, exhausting within the building, and consisting of:
  - (1) Twelve (12) manual metal inert gas (MIG) welding stations; and
  - (2) Four (4) robotic MIG welding stations.
- (g) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal unit per hour (MMBtu), exhausting to various stacks, and consisting of:
  - (1) One (1) Maxon Oven Pack, rated at 2.5 MMBtu/hr.
  - (2) One (1) Maxon Washer Burner, rated at 0.80 MMBtu/hr.
  - (3) One (1) Maxon Washer Burner, rated at 1.50 MMBtu/hr.
  - (4) Eight (8) Reznor Space Heaters, rated at 0.20 MMBtu/hr each.
  - (5) One (1) Lennox Furnace, rated at 0.05 MMBtu/hr.
  - (6) One (1) Rupp Air Make-up unit, rated at 0.475 MMBtu/hr.
  - (7) Two (2) Rupp Air Make-up units, rated at 0.653 MMBtu/hr each.

**Ditto Sales - 267 30th Street, Jasper, Indiana**

- (h) One (1) surface coating operation, identified as Surface Coat, approved for construction in 2009, applying coatings to wood furniture via an air-assisted airless spray application system, with a maximum capacity of 2.2 units per hour, and less than five (5) gallons of coating per day, using fabric filters as particulate control, and exhausting to stack SV-1.

The following state rules shall be applicable:

- (a) 326 IAC 5-1 (Opacity Limitations)  
The source is located in Bainbridge Township of Dubois County, 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 thirty percent (30%) 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) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (c) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)  
The surface coating line is subject to 326 IAC 8-2-12 because the actual VOC emissions are greater than 15 lb/day when coating wood furniture and the facility was constructed after 1990.

Pursuant to 326 IAC 8-2-12, an owner or operator of a wood furniture or cabinet coating operation subject to this section shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

Airless spray application system;  
Air-assisted airless spray application system;  
Electrostatic spray application system;  
Electrostatic bell or disc application system;  
Heated airless spray application system;  
Roller coat, brush or wipe application system; or  
Dip-and-drain application system.

This exemption is the second air approval issued to this source. A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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. If you have any questions on this matter, please contact Jason R. Krawczyk, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-232-8427 or at 1-800-451-6027 (ext 2-8427).

Sincerely,



Iryn Callung, Section Chief  
Permits Branch  
Office of Air Quality

IC/JRK

cc: File - Dubois County  
Dubois County Health Department  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for an Exemption

Source Description and Location
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<b>Source Name:</b>	<b>Ditto Sales</b>
<b>Source Location:</b>	<b>2332 Cathy Lane, Jasper, IN 47546 267 30th Street, Jasper, IN 47546</b>
<b>County:</b>	<b>Dubois</b>
<b>SIC Code:</b>	<b>2522</b>
<b>Exemption No.:</b>	<b>037-27593-00083</b>
<b>Permit Reviewer:</b>	<b>Jason R. Krawczyk</b>

On March 5, 2009, the Office of Air Quality (OAQ) received an application from Ditto Sales related to the construction and operation of new emission units (wood furniture coating operation) and the continued operation of an existing metal furniture manufacturing facility.

Source Definition
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Ditto Sales has two plants located in Jasper Indiana. Plant A is located at 2332 Cathy Lane and Plant B is located at 267 30th Street. The two plants are approximately 1.0 miles apart. IDEM, OAQ has examined whether the two plants are part of the same source.

The term "source" is defined at 326 IAC 1-2-73. In order for these two plants to be considered one source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on contiguous or adjacent properties.

IDEM, OAQ will first look at whether the two plants will be under common ownership or common control. The two plants are owned by Ditto Sales, therefore common ownership exists and the first element of the definition is met.

The second element of the source definition is whether the plants have the same two-digit Standard Industrial Classification (SIC) Code, or if one serves as a support facility for the other. The SIC Codes can be found at <http://www.osha.gov/pls/imis/sicsearch.html> on the United States Department of Labor, Occupational Safety and Health Administration website. The proper two-digit code for both plants is Major Group 25: Furniture and Fixtures.

A plant is considered a support facility if at least 50% of its total output is dedicated to another plant. Plant B sends 100% of its output, coated wood furniture, to Plant A. Plant A sends approximately 10% of its total output to Plant B. Therefore, Plant B is a support facility to Plant A. Since the two plants have the same two-digit SIC Code and a support facility relationship, the two plants meet the second element of the definition of a source.

Since the plants are located on properties 1.0 miles apart and 100% of the output of Plant B goes to Plant A, the plants are adjacent and the third element of the definition is met. IDEM, OAQ has determined that the two plants meet all the elements of the source definition and are part of the same source.

### Existing Approvals

The source has been operating under Exemption No.037-3587-00083, issued on March 24, 1994.

### County Attainment Status

The source is located in Dubois County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.  
Basic nonattainment designation effective federally April 5, 2005, for PM2.5.

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM2.5  
Dubois County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8<sup>th</sup>, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) Other Criteria Pollutants  
Dubois County has been classified as attainment or unclassifiable 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.

### Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

### Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Ditto Sales on March 5, 2009, relating to the addition of a new spray coating operation at their existing metal and wood furniture manufacturing facility.

The source consists of the following existing emission unit(s):

**Ditto Sales - 2332 Cathy Lane, Jasper, Indiana**

- (a) One (1) powder coating operation, identified as Powder, constructed in 2007, applying coatings to metal furniture via HDLV powder spray equipment, with a maximum capacity of 150 units per hour, using dust collectors DC21 and DC22 as particulate control, and exhausting within the building.
- (b) One (1) woodworking operation, identified as WW1, with units constructed in 1995, 1998, 2004, and 2007, with a maximum throughput rate of 50 units per hour, using dust collectors DC3 through DC6 as particulate control, exhausting within the building, and consisting of:
  - (1) Six (6) CNC edge banders; and
  - (2) One (1) CNC router.
- (c) One (1) buffing operation, identified as Buffing, constructed in 1999, with a maximum capacity of 250 units per hour, using dust collector DC20 as particulate control, exhausting within the building, and consisting of:
  - (1) Three (3) backstand polishers; and
  - (2) Two (2) table polishers.
- (d) One (1) machining operation, identified as Mach OP 1, constructed in 2003, with a maximum capacity of 400 units per hour, using dust collector DC1 as particulate control, exhausting within the building, and consisting of:
  - (1) Two (2) lasers.
- (e) One (1) machining operation, identified as Mach OP 2, constructed in 2005, with a maximum capacity of 100 units per hour, using dust collector DC2 as particulate control, exhausting within the building, and consisting of:
  - (1) One (1) cutoff saw; and
  - (2) One (1) shaper.
- (f) One (1) welding operation, using less than six hundred twenty-five (625) pounds of weld wire per day, utilizing dust collectors DC7 through DC19 as particulate control, exhausting within the building, and consisting of:
  - (1) Twelve (12) manual metal inert gas (MIG) welding stations; and
  - (2) Four (4) robotic MIG welding stations.
- (g) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal unit per hour (MMBtu), exhausting to various stacks, and consisting of:
  - (1) One (1) Maxon Oven Pack, rated at 2.5 MMBtu/hr.
  - (2) One (1) Maxon Washer Burner, rated at 0.80 MMBtu/hr.
  - (3) One (1) Maxon Washer Burner, rated at 1.50 MMBtu/hr.
  - (4) Eight (8) Reznor Space Heaters, rated at 0.20 MMBtu/hr each.

- (5) One (1) Lennox Furnace, rated at 0.05 MMBtu/hr.
- (6) One (1) Rupp Air Make-up unit, rated at 0.475 MMBtu/hr.
- (7) Two (2) Rupp Air Make-up units, rated at 0.653 MMBtu/hr each.

The following is a list of the new emission units and pollution control devices:

**Ditto Sales - 267 30th Street, Jasper, Indiana**

- (a) One (1) surface coating operation, identified as Surface Coat, approved for construction in 2009, applying coatings to wood furniture via an air-assisted airless spray application system, with a maximum capacity of 2.2 units per hour, and less than five (5) gallons per day, using fabric filters as particulate control, and exhausting to stack SV-1.

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Exemption**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Combustion	0.07	0.27	0.27	0.02	3.61	0.20	3.03	0.07	negl.
Spray Coating	0.52	0.52	0.52	negl.	negl.	7.14	negl.	1.93	1.46 Toluene
Powder Coating	0.69	0.69	0.69	negl.	negl.	negl.	negl.	negl.	negl.
Woodworking	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.
Buffing	1.80	1.80	1.80	negl.	negl.	negl.	negl.	negl.	negl.
Machine Operations	0.03	0.03	0.03	negl.	negl.	negl.	negl.	negl.	negl.
Welding	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.
<b>Total PTE of Entire Source</b>	<b>3.11</b>	<b>3.32</b>	<b>3.32</b>	<b>0.02</b>	<b>3.61</b>	<b>7.33</b>	<b>3.03</b>	<b>2.00</b>	<b>1.46 Toluene</b>
Exemptions Levels	5	5	5	10	10	10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10

negl. = negligible  
 \* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and

not subject to the provisions of 326 IAC 2-7.

### **Federal Rule Applicability Determination**

#### New Source Performance Standards (NSPS)

- (a) This requirements of the New Source Performance Standards (NSPS) for Surface Coating of Metal Furniture, 40 CFR 60.310, Subpart EE, are not included in this permit because the source does not apply organic coatings to metal. The source performs powder coating, which is not included in the definition of organic coatings found in 40 CFR 60.311.
- (b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63.800, Subpart JJ (326 IAC 20-14), are not included in the permit because although the is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components, it is not located at a plant site that is a major source as defined in 40 CFR Part 63.2, Subpart A.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are not included in the permit because although the source performs surface coating of metal furniture, this source is not a major source, is not located at a major source, and is not part of a major source of emissions of hazardous air pollutants (HAP).
- (e) The requirements for the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit, because although the spray application of coatings containing compounds of chromium (Cr) is performed, it is not to parts or products made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

#### Compliance Assurance Monitoring (CAM)

- (g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

### **State Rule Applicability Determination**

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)  
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326

IAC 2-4.1.

- (c) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)  
The source is located in Bainbridge Township of Dubois County, 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 thirty percent (30%) 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.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 6.5-1-1 (Particulate Matter Limitations Except Lake County)  
The source is not subject to the requirements of 326 IAC 6.5-1-1, because the source does not have potential particulate emissions greater than 100 tons per year or actual particulate emissions greater than 10 tons per, and it is not specifically listed in 326 IAC 6.5-4 (Particulate Matter Limitations Dubois County).
- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Surface Coating

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(15), the surface coating operation is exempt from the requirements of 326 IAC 6-3, because less than five (5) gallons of coatings are used per day.
- (j) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)  
The surface coating line is subject to 326 IAC 8-2-12 because the actual VOC emissions are greater than 15 lb/day when coating wood furniture and the facility was constructed after 1990.
- Pursuant to 326 IAC 8-2-12, an owner or operator of a wood furniture or cabinet coating operation subject to this section shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

Airless spray application system;  
Air-assisted airless spray application system;  
Electrostatic spray application system;  
Electrostatic bell or disc application system;  
Heated airless spray application system;  
Roller coat, brush or wipe application system; or  
Dip-and-drain application system.

#### Powder Coating

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(14), the powder coating operations are exempt from the requirements of 326 IAC 6-3, because potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.
- (l) 326 IAC 8-2-6 (Metal Furniture Coating Operations)  
The powder coating line is not subject to 326 IAC 8-2-6 because the potential and actual Volatile Organic Compound (VOC) emissions when coating metal furniture are less than 15 lb/day.

#### Woodworking

- (m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(14), the woodworking operations are exempt from the requirements of 326 IAC 6-3, because potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

#### Buffing

- (n) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(14), the buffing operations are exempt from the requirements of 326 IAC 6-3, because potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

#### Machine Operations

- (o) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(14), the machine operations are exempt from the requirements of 326 IAC 6-3, because potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

#### Welding

- (p) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3, because less than six hundred twenty-five (625) pounds of rod or wire is consumed per day.

<b>Conclusion and Recommendation</b>
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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 March 5, 2009.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No.

037-27593-00083. The staff recommends to the Commissioner that this Exemption be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**SUMMARY OF EMISSIONS**

**Company Name:** Ditto Sales  
**Address City IN Zip:** 2332 Cathy Lane, Jasper, IN 47546  
**Permit Number:** 037-27593-00083  
**Plt ID:** 037-00083  
**Reviewer:** Jason R. Krawczyk  
**Date:** April 15, 2009

Uncontrolled Emissions (Tons/Yr)								
Pollutant	Combustion	Surface Coating	Powder Coating	Woodworking	Buffing	Machine Operations	Welding	Total PTE
PM	0.07	0.52	0.69	0.00	1.80	0.03	0.00	3.11
PM10	0.27	0.52	0.69	0.00	1.80	0.03	0.00	3.32
PM2.5	0.27	0.52	0.69	0.00	1.80	0.03	0.00	3.32
VOC	0.20	7.14	-	-	-	-	-	7.33
NOx	3.61	-	-	-	-	-	-	3.61
SO2	0.02	-	-	-	-	-	-	0.02
CO	3.03	-	-	-	-	-	-	3.03
Single HAP (Toluene)	-	1.46	-	-	-	-	-	1.46
Combined HAPs	0.07	1.93	-	-	-	-	0.00	2.00

Controlled / Limited Emissions (Tons/Yr)								
Pollutant	Combustion	Surface Coating	Powder Coating	Woodworking	Buffing	Machine Operations	Welding	Total PTE
PM	0.07	0.05	0.01	0.00	0.02	0.00	0.00	0.15
PM10	0.27	0.05	0.01	0.00	0.02	0.00	0.00	0.36
PM2.5	0.27	0.05	0.01	0.00	0.02	0.00	0.00	0.36
VOC	0.20	7.14	-	-	-	-	-	7.33
NOx	3.61	-	-	-	-	-	-	3.61
SO2	0.02	-	-	-	-	-	-	0.02
CO	3.03	-	-	-	-	-	-	3.03
Single HAP (Toluene)	-	1.46	-	-	-	-	-	1.46
Combined HAPs	0.07	1.93	-	-	-	-	0.00	2.00

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Ditto Sales  
**Address City IN Zip:** 2332 Cathy Lane, Jasper, IN 47546  
**Permit Number:** 037-27593-00083  
**Plt ID:** 037-00083  
**Reviewer:** Jason R. Krawczyk  
**Date:** April 15, 2009

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Unit ID
2.500	21.90	One (1) Maxon Oven Pack @ 2.50 MMBtu/hr
0.800	7.01	One (1) Maxon Washer Burner @ 0.80 MMBtu/hr
1.500	13.14	One (1) Maxon Washer Burner @ 1.50 MMBtu/hr
1.600	14.02	Eight (8) Reznor Space Heaters @ 0.20 MMBtu/hr each
0.050	0.44	One (1) Lenox Furnace @ 0.05 MMBtu/hr
0.475	4.16	One (1) Rupp Air Make-up units @ 0.475 MMBtu/hr
1.306	11.44	Two (2) Rupp Air Make-up units @ 0.653 MMBtu/hr each
<b>8.23</b>	<b>72.10</b>	

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.07	0.27	0.02	3.61	0.20	3.03

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

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: Ditto Sales**  
**Address City IN Zip: 2332 Cathy Lane, Jasper, IN 47546**  
**Permit Number: 037-27593-00083**  
**Plt ID: 037-00083**  
**Reviewer: Jason R. Krawczyk**  
**Date: March 11, 2009**

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.571E-05	4.326E-05	2.704E-03	6.489E-02	1.226E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.803E-05	3.966E-05	5.047E-05	1.370E-05	7.571E-05

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Company Name: Ditto Sales  
Address City IN Zip: 2332 Cathy Lane, Jasper, IN 47546  
Permit Number: 037-27593-00083  
Plt ID: 037-00083  
Reviewer: Jason R. Krawczyk  
Date: April 15, 2009**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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	Particulate Control Efficiency
<b>Coatings</b>																	
Blossomo Cherry	6.94	98.00%	0.0%	84.4%	0.0%	0.00%	0.05000	2.200	5.86	5.86	0.64	15.46	2.82	0.02	N/A	75%	90.00%
Espresso NWS	6.99	97.00%	0.0%	83.4%	0.0%	0.00%	0.05000	2.200	5.83	5.83	0.64	15.39	2.81	0.03	N/A	75%	90.00%
Cordovan Cherry	7.12	95.20%	0.0%	83.4%	0.0%	2.60%	0.05000	2.200	5.94	5.94	0.65	15.68	2.86	0.04	N/A	75%	90.00%
Casegoods	6.94	97.90%	0.0%	84.4%	0.0%	1.20%	0.05000	2.200	5.86	5.86	0.64	15.46	2.82	0.02	N/A	75%	90.00%
Gld Chy on Chy	6.92	98.30%	0.0%	84.7%	0.0%	1.00%	0.05000	2.200	5.86	5.86	0.64	15.47	2.82	0.01	N/A	75%	90.00%
Brighton Walnut	6.61	98.60%	0.0%	90.0%	0.0%	0.70%	0.05000	2.200	5.95	5.95	0.65	15.71	2.87	0.01	N/A	75%	90.00%
Carmel Maple	6.59	99.00%	0.0%	90.3%	0.0%	0.50%	0.05000	2.200	5.95	5.95	0.65	15.71	2.87	0.01	N/A	75%	90.00%
Blossom Cherry*	6.63	98.30%	0.0%	89.8%	0.0%	1.00%	0.05000	2.200	5.95	5.95	0.65	15.72	2.87	0.01	N/A	75%	90.00%
Millwork Cherry	6.87	99.40%	0.0%	85.5%	0.0%	0.30%	0.05000	2.200	5.87	5.87	0.65	15.51	2.83	0.00	N/A	75%	90.00%
Sugar Maple	6.85	99.50%	0.0%	85.2%	0.0%	0.30%	0.05000	2.200	5.84	5.84	0.64	15.41	2.81	0.00	N/A	75%	90.00%
Solar on Mpl	6.85	99.50%	0.0%	85.1%	0.0%	0.30%	0.05000	2.200	5.83	5.83	0.64	15.39	2.81	0.00	N/A	75%	90.00%
No Wipe Stain Brwn	7.09	94.90%	0.1%	82.4%	0.1%	2.90%	0.05000	2.200	5.85	5.84	0.64	15.42	2.81	0.04	N/A	75%	90.00%
60 Sheen Varnish	7.96	65.00%	0.0%	60.7%	0.0%	28.60%	0.05000	2.200	4.83	4.83	0.53	12.76	2.33	0.34	N/A	75%	90.00%
Sealer	7.87	63.90%	0.0%	63.9%	0.0%	28.80%	0.05000	2.200	5.03	5.03	0.55	13.28	2.42	0.34	N/A	75%	90.00%
<b>Solvents</b>																	
Reducer	6.84	100.00%	0.0%	85.7%	0.0%	0.00%	0.02500	2.200	5.86	5.86	0.32	7.74	1.41	0.00	N/A	75%	90.00%
Catalyst	8.01	63.80%	4.5%	59.3%	2.2%	25.20%	0.02500	2.200	4.86	4.75	0.26	6.27	1.14	0.17	N/A	75%	90.00%
Lacquer Thinner	7.10	100.00%	0.0%	100.0%	0.0%	0.00%	0.02500	2.200	7.10	7.10	0.39	9.37	1.71	0.00	N/A	100%	N/A

**Uncontrolled Potential Emissions: 1.63      39.10      7.14      0.52  
Controlled Potential Emissions: 1.63      39.10      7.14      0.05**

**Note:**

Potential Emissions = Worst Coating\* + Sum of all solvents used

**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)

Uncontrolled Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Controlled Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs) \* (1 - Particulate Control Efficiency)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

**Appendix A: Emission Calculations  
HAP Emissions  
From Surface Coating Operations**

**Company Name: Ditto Sales  
Address City IN Zip: 2332 Cathy Lane, Jasper, IN 47546  
Permit Number: 037-27593-00083  
Pit ID: 037-00083  
Reviewer: Jason R. Krawczyk  
Date: April 15, 2009**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ethers	Weight % Ethylbenzene	Weight % MIK	Weight % Chromium	Weight % Cobalt	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	MIK Emissions (ton/yr)	Chromium Emissions (ton/yr)	Cobalt Emissions (ton/yr)
<b>Coatings</b>																	
Blossomo Cherry	6.94	0.050	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.04%	0.02%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Espresso NWS	6.99	0.050	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.09%	0.03%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cordovan Cherry	7.12	0.050	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.03%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Casegoods	6.94	0.050	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.04%	0.02%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gld Chy on Chy	6.92	0.050	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.03%	0.01%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Brighton Walnut	6.61	0.050	2.20	0.00%	4.00%	2.00%	0.00%	0.00%	0.04%	0.01%	0.00	0.13	0.06	0.00	0.00	0.00	0.00
Carmel Maple	6.59	0.050	2.20	0.00%	5.00%	2.00%	0.00%	0.00%	0.02%	0.01%	0.00	0.16	0.06	0.00	0.00	0.00	0.00
Blossom Cherry	6.63	0.050	2.20	0.00%	4.00%	2.00%	0.00%	0.00%	0.05%	0.02%	0.00	0.13	0.06	0.00	0.00	0.00	0.00
Millwork Cherry	6.87	0.050	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.01%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sugar Maple	6.85	0.050	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Solar on Mpl	6.85	0.050	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
No Wipe Stain Brwn	7.09	0.050	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00	0.00	0.00	0.00	0.00	0.01	0.00
60 Sheen Varnish	7.96	0.050	2.20	6.00%	0.00%	5.00%	1.00%	0.00%	0.00%	0.00%	0.23	0.00	0.19	0.04	0.00	0.00	0.00
Sealer	7.87	0.050	2.20	2.00%	5.00%	0.00%	0.40%	0.00%	0.00%	0.00%	0.08	0.19	0.00	0.02	0.00	0.00	0.00
<b>Solvents</b>																	
Reducer	6.84	0.025	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalyst	8.01	0.025	2.20	0.00%	66.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	1.27	0.00	0.00	0.19	0.00	0.00
Lacquer Thinner	7.10	0.025	2.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Potential Emissions (Worst Coating + Sum of all solvents):</b>											<b>0.23</b>	<b>1.46</b>	<b>0.19</b>	<b>0.04</b>	<b>0.19</b>	<b>0.01</b>	<b>0.00</b>

**Worst Single HAP: 1.46  
Combined HAPs: 1.93**

**Note:**

Worst Single HAP (Toluene) = Worst Coating (Sealer) + Sum of all solvents used  
Combined HAPs = Worst Coating (60 Sheen Varnish)+ Sum of all solvents used

**Methodology:**

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

**Appendix A: Emissions Calculations  
Particulate Emissions  
From Powder Coating Operations**

**Company Name:** Ditto Sales  
**Address City IN Zip:** 2332 Cathy Lane, Jasper, IN 47546  
**Permit Number:** 037-27593-00083  
**Plt ID:** 037-00083  
**Reviewer:** Jason R. Krawczyk  
**Date:** April 15, 2009

Application Rate (lbs/unit)	Max. Production Rate (units/hr)	Utilization Rate / Transfer Efficiency (%)	PTE Uncontrolled PM/PM10/PM2.5 (tons/yr)	Control Efficiency (%)	PTE Controlled PM/PM10/PM2.5 (tons/yr)
0.021	150	95.00%	0.69	99.00%	0.01

**Note:**

Utilization Rate/Transfer Efficiency obtained from AP42 Chapter 4.2.2.12, Figure 4.2.2.12-1

**Methodology:**

PTE Uncontrolled (tons/yr) = Application Rate (lbs/unit) \* Max. Production Rate (units/hr) \* (1 - Utilization Rate) \* 8760 hrs / 2000 lbs

PTE Controlled (tons/yr) = PTE Uncontrolled (tons/yr) \* (1 - Control Efficiency)

**Appendix A: Emissions Calculations  
Particulate Emissions  
From Woodworking Operations**

**Company Name:** Ditto Sales  
**Address City IN Zip:** 2332 Cathy Lane, Jasper, IN 47546  
**Permit Number:** 037-27593-00083  
**Plt ID:** 037-00083  
**Reviewer:** Jason R. Krawczyk  
**Date:** April 15, 2009

Max. Material Collected (lbs/yr)	Estimated PM (% <100ug)	Max. PM/PM10/PM2.5 Collected (lbs/yr)	Collection Efficiency (%)	PTE w/o use of Cartridge Filters (tons/yr)	PTE with use of Cartridge Filters (tons/yr)
118260	2%	2365.20	99.97%	1.18	0.00

**Note:**

Mass Balance information provided by Permittee.

In October of 1993 a Final Order Granting Summary Judgment was signed by an Administrative Law Judge ("ALJ") resolving an appeal of an IDEM permit related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility, and therefore, potential emissions were to be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

**Methodology:**

Max. PM Collected (lbs/yr) = Max. Material Collected (lbs/yr) \* Estimated PM (% < 100 ug)

PTE w/o use of Cartridge Filters (tons/yr) = Max. PM/PM10/PM2.5 Collected (lbs/yr) / 2000 lbs

PTE with use of Cartridge Filters (tons/yr) = PTE w/o use of Cartridge Filters (tons/yr) \* (1 - Collection Efficiency)

**Appendix A: Emissions Calculations  
Particulate Emissions  
From Buffing Operations**

**Company Name:** Ditto Sales  
**Address City IN Zip:** 2332 Cathy Lane, Jasper, IN 47546  
**Permit Number:** 037-27593-00083  
**Plt ID:** 037-00083  
**Reviewer:** Jason R. Krawczyk  
**Date:** April 15, 2009

Max. Material Collected (lbs/yr)	Estimated Particulate (% <100ug)	Max. PM/PM10/PM2.5 Collected (lbs/yr)	Collection Efficiency (%)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)
72047.63	5%	3602.38	99.00%	1.80	0.02

**Note:**

Mass Balance information provided by Permittee.

**Methodology:**

Max. PM Collected (lbs/yr) = Max. Material Collecte (lbs/yr) \* Estimated PM (% < 100 ug)

Uncontrolled PTE (tons/yr) = Max. PM/PM10/PM2.5 Collected (lbs/yr) / 2000 lbs

Controlled PTE (tons/yr) = Uncontrolled PTE (tons/yr) \* (1 - Collection Efficiency)

**Appendix A: Emissions Calculations  
Particulate Emissions  
From Machine Operations**

**Company Name:** Ditto Sales  
**Address City IN Zip:** 2332 Cathy Lane, Jasper, IN 47546  
**Permit Number:** 037-27593-00083  
**Plt ID:** 037-00083  
**Reviewer:** Jason R. Krawczyk  
**Date:** April 15, 2009

**(2) Machine Operations**

Max. Material Collected (lbs/yr)	Estimated Particulate (% <100ug)	Max. PM/PM10/PM2.5 Collected (lbs/yr)	Collection Efficiency (%)	Uncontrolled PTE (tons/yr)	Controlled PTE (tons/yr)
2001.32	3%	60.04	99.00%	0.03	0.00

**Note:**

Mass Balance information provided by Permittee.

**Methodology:**

Max. PM Collected (lbs/yr) = Max. Material Collecte (lbs/yr) \* Estimated PM (% < 100 ug)

Uncontrolled PTE (tons/yr) = Max. PM/PM10/PM2.5 Collected (lbs/yr) / 2000 lbs

Controlled PTE (tons/yr) = Uncontrolled PTE (tons/yr) \* (1 - Collection Efficiency)

Appendix A: Emissions Calculations

Welding

Company Name: Ditto Sales  
 Address City IN Zip: 2332 Cathy Lane, Jasper, IN 47546  
 Permit Number: 037-27593-00083  
 Pit ID: 037-00083  
 Reviewer: Jason R. Krawczyk  
 Date: April 15, 2009

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption (lb/yr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(E70S)	16	0.01	1650	0.0055	0.0005	0.000001	0.000001	0.001	0.000	0.000	1.884E-07	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.00				0.00
Potential Emissions lbs/day								0.02				0.00
Potential Emissions tons/year								0.00				0.00

**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