



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 26, 2013

RE: Merhow / 039 - 32900 - 00135

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



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April 26, 2013

Matt Hazelbaker
Merhow
306 Depot St
Bristol, Indiana 46507

Re: 039-32900-00135
First Administrative Amendment to
R039-12075-00135

Dear Matt Hazelbaker:

Dadon Corporation DBA Merhow Industries was issued a Registration No. R039-12075-00135 on June 6, 2000 for a stationary deluxe horse trailer manufacturing plant located at 306 Depot St, Bristol, Indiana 46507. On February 28, 2013, the Office of Air Quality (OAQ) received an application from the source requesting ownership change, company name change and to update descriptive information regarding the air atomization paint booth, identified as S-1. In addition, the source provided updated information for the surface coating and welding operation and associated calculations (see Appendix A).

1. Pursuant to 326 IAC 2-5.5-6(d)(3), this change to the registration is considered an administrative amendment because the registration is amended to indicate a change in ownership, company name or operational control of the source.

The company name has been revised throughout the registration as follows:

Company Name: ~~Dadon Corporation DBA Merhow Industries~~
Merhow

2. The source also requested to update the emission unit description for the one (1) air atomization paint booth, identified as S-1. The paint booth, identified as S-1 is used for applying undercoating to the frame and bed liner on a portion of the floor of the trailer once finished. Pursuant to 326 IAC 2-5.5-6(d)(2)(B), this change to the registration is considered an administrative amendment because the registration is amended to indicate changes in descriptive information concerning the source or emission units. The registration has been amended as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

The emission unit description for paint booth S-1 has been revised throughout the registration as follows:

- (a) One (1) air atomization paint booth, identified as S-1, with a maximum metal throughput of 0.375 units per hour, ~~maximum paint usage of 19.05 pounds per hour~~, particulate matter controlled by dry filters and exhausts to one (1) stack identified as S-1.

...

Additional Changes

Upon further review, IDEM, OAQ has decided to make additional amendments to the registration as described below. The registration has been amended as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

1. The registration has been updated from the letter style format to the permit style format, as is now standard IDEM procedure. The registration now contains standard requirements for all Registrations under Sections B and C. In addition, IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (AI) in registrations.
2. Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the registration. References to "Compliance Data Section" and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". The registration has been revised as follows:

~~Compliance Data Section~~ **Compliance and Enforcement Branch**
~~Compliance Branch~~ **Compliance and Enforcement Branch**

3. The county attainment status (now under Section A.1) has been revised to indicate that Elkhart County is now in attainment for the 8-hour ozone standard as follows:

Source Location Status: ~~Nonattainment area for 8-hour ozone~~
 ~~Attainment area for all other-criteria pollutants~~

4. Greenhouse Gases
 Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit (PTE) 100,000 tons per year or more of CO2 equivalent emissions (CO2e). Therefore, CO2e emissions have been calculated for this source. Based on the calculations, the unlimited PTE GHGs from the entire source is less than 100,000 tons of CO2e per year (see Appendix A for the calculations). This did not require any changes to the registration.

5. 326 IAC 6-3-2 (Particulate emission limitations)
 The applicability of 326 IAC 6-3-2 (Particulate emission limitations) has been reevaluated as follows:

- (1) Pursuant to 326 IAC 6-3-1(b)(15), the air atomization paint booth S-1 is subject to the requirements of 326 IAC 6-3-2(d), since it has the potential to use equal to or greater than five (5) gallons per day of surface coatings.
- (2) Pursuant to 326 IAC 6-3-1(b)(9), each of the welding stations is each exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire from each station is less than six hundred twenty-five (625) pounds per day.

The registration has been revised as follows:

2. ~~Pursuant to the 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the paint booth designated as S-1, shall be limited by the following:~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour.}$$

~~The dry filters shall be in operation at all times the paint booth designated as S-1 is in operation, in order to comply with this limit.~~

3. Pursuant to the 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the twelve (12) MIG welding stations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour;}$$

$$E_{w(\text{welding})} = 4.10 * (1.88 \text{ lb/hr*ton}/2000 \text{ lb})^{0.67} = 0.04 \text{ lb/hr.}$$

D.1.1 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the paint booth S-1 shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Registrant shall operate the control device in accordance with manufacturer's specification.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Registrant 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
- (c) If overspray is visibly detected, the Registrant 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.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for paint booth S-1. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the dry filters for particulate control shall be in operation at all times when the paint booth S-1 is in operation.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(c), the Registrant shall maintain a record of any actions taken if overspray is visibly detected.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

6. 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations),
The paint booth (S-1) is only used for applying undercoating to the frame and bed liner on a portion of the floor of the trailer. Paint booth S-1 performs a metal coating process, the source operates under the Standard Industrial Classification Code major group #37, and the source was constructed after July 1, 1990; however the paint booth (S-1) now has potential VOC emission less than 15 pounds per day. Therefore, the paint booth operation (S-1) is no longer subject to the requirements of 326 IAC 8-2-9 and the source has requested to remove the requirements from the registration. The 326 IAC 8-2-9 rule requirements have been removed from the registration as follows:

- ~~4. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.~~

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

7. 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.

The registration has been revised as follows:

- ~~5. Pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).~~

The source shall continue to operate according to 326 IAC 2-5.5 (Registrations). Please find enclosed the amended registration and Appendix A. A copy of the registration 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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Marcia Earl, at (800) 451-6027, press 0 and ask for Marcia Earl or extension 3-0863, or dial (317) 233-0863.

Sincerely,



Nathan Bell, Section Chief
Permits Branch
Office of Air Quality

NB/me

Attachment: Revised Registration and calculations

cc: File - Elkhart County
Elkhart County Health Department
Compliance and Enforcement Branch



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REGISTRATION OFFICE OF AIR QUALITY

Merhow
306 Depot St
Bristol, Indiana 46507

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R039-12075-00135	
Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: June 6, 2000

First Notice-Only Change No. 039-12369-00135, issued July 11, 2000

First Administrative Amendment No. 039-32900-00135	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 26, 2013

SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary deluxe horse trailer manufacturing plant.

Source Address:	306 Depot St, Bristol, Indiana 46507
General Source Phone Number:	(574) 484-4445
SIC Code:	3792 (Travel Trailer and Camper Manufacturing)
County Location:	Elkhart County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) air atomization paint booth, identified as S-1, with a maximum metal throughput of 0.375 units per hour, particulate matter controlled by dry filters and exhausts to one (1) stack identified as S-1.
- (b) Six (6) metal inert gas (MIG) welding stations, with a maximum aluminum wire consumption of 0.26 pounds per hour and exhaust to the atmosphere.
- (c) Six (6) metal inert gas (MIG) welding stations, with a maximum steel wire consumption rate of 1.55 pounds per hour and exhaust to the atmosphere.
- (d) Six (6) natural gas-fire radiant heaters, designated as H-1 through H-6, with a maximum heat input capacity of 0.175 MMBtu/hr each and exhaust to the atmosphere.
- (e) Five (5) natural gas-fired radiant heaters, designated as H-1 through H-6, with a maximum heat input capacity of 0.100 MMBtu/hr each and exhaust to the atmosphere.

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. R039-12075-00135 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, IN 46204-2251

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), 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.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Registrant shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

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 registration:

- (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.

C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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 (Fugitive Dust Emissions).

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)]

C.3 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]

- (a) Records of all required monitoring data, reports and support information required by this registration shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Registrant, the Registrant shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this registration, for all record keeping requirements not already legally required, the Registrant shall be allowed up to ninety (90) days from the date of registration issuance or the date of initial start-up, whichever is later, to begin such record keeping.

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) air atomization paint booth, identified as S-1, with a maximum metal throughput of 0.375 units per hour, particulate matter controlled by dry filters and exhausts to one (1) stack identified as S-1.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the paint booth S-1 shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Registrant shall operate the control device in accordance with manufacturer's specification.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Registrant 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
- (c) If overspray is visibly detected, the Registrant 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.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for air atomization paint booth S-1. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the dry filters for particulate control shall be in operation at all times when the paint booth S-1 is in operation.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(c), the Registrant shall maintain a record of any actions taken if overspray is visibly detected.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Merhow
Address:	306 Depot St
City:	Bristol, Indiana 46507
Phone Number:	(219) 848-4445
Registration No.:	R039-12075-00135

I hereby certify that Merhow is :

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. R039-12075-00135.
- not in compliance with the requirements of Registration No. R039-12075-00135.

I hereby certify that Merhow is :

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

**Appendix A: Emissions Calculations
Emissions Summary
Before Amendment**

Company Name: Merhow
Source Address: 306 Depot St, Bristol, Indiana 46507
Administrative Amendment No.: 039-32900-00135
Reviewer: Marcia Earl
Date: March 2013

Uncontrolled Emissions

Emission Units	PM	PM ₁₀	SO ₂	NOx	VOC	CO	TOTAL HAPs	WORST CASE SINGLE HAP
Surface Coating	12.71	12.71	0.0	0.0	16.94	0.0	4.52	2.48 Xylene
Welding	0.13	0.13	0.0	0.0	0.0	0.0	0.0	--
Natural Gas Combustion	0.08	0.08	4.0E-03	0.68	0.04	0.14	0.0	0.0 --
Total	12.92	12.92	4.0E-03	0.68	16.98	0.14	4.52	2.48 Xylene

Controlled Emissions

Emission Units	PM	PM ₁₀	SO ₂	NOx	VOC	CO	TOTAL HAPs	WORST CASE SINGLE HAP
Surface Coating	0.33	0.46	0.0	0.0	16.94	0.0	4.52	2.48 Xylene
Welding	0.13	0.13	0.0	0.0	0.00	0.0	0.00	--
Natural Gas Combustion	0.08	0.08	4.0E-03	0.68	0.04	0.14	0.00	0.00 --
Total	0.54	0.67	4.0E-03	0.68	16.98	0.14	4.52	2.48 Xylene

**Appendix A: Emissions Calculations
Emissions Summary
After Amendment**

Company Name: Merhow
Source Address: 306 Depot St, Bristol, Indiana 46507
Administrative Amendment No.: 039-32900-00135
Reviewer: Marcia Earl
Date: March 2013

Uncontrolled Emissions

Emission Units	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e	TOTAL HAPs	WORST CASE SINGLE HAP
Surface Coating	7.51	7.51	7.51	0.0	0.0	2.53	0.0	0.0	0.89	0.89 Toluene
Welding	0.75	0.75	0.75	0.0	0.0	0.0	0.0	0.0	0.02	0.02 Mn
Natural Gas Combustion	0.01	0.05	0.05	4.0E-03	0.67	0.04	0.56	804	1.3E-02	1.2E-02 Hexane
Total	8.27	8.31	8.31	4.0E-03	0.67	2.57	0.56	804	0.92	0.89 Toluene

Controlled Emissions

Emission Units	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e	TOTAL HAPs	WORST CASE SINGLE HAP
Surface Coating	0.08	0.08	0.08	0.0	0.0	2.53	0.0	0.0	0.89	0.89 Toluene
Welding	0.75	0.75	0.75	0.0	0.0	0.0	0.0	0.0	0.02	0.02 Mn
Natural Gas Combustion	0.01	0.05	0.05	4.0E-03	0.67	0.04	0.56	804	1.3E-02	1.2E-02 Hexane
Total	0.84	0.88	0.88	4.0E-03	0.67	2.57	0.56	804	0.92	0.89 Toluene

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

Company Name: Merhow
Source Address: 306 Depot St, Bristol, Indiana 46507
Administrative Amendment No.: 039-32900-00135
Reviewer: Marcia Earl
Date: March 2013

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)	Gal of Mat. (gal/day)	Pounds VOC per gallon of coating less	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
7960 Undercoating (water based asphalt)*	10.58	50.00%	50.0%	0.0%	60.0%	40.00%	0.987	0.375	8.883	0.00	0.00	0.00	0.00	0.00	4.28	0.00	50%
Acetone**	6.97	0.00%	0.0%	0.0%	0.0%	0.00%	0.373	0.375	3.357	0.00	0.00	0.00	0.00	0.00	2.13	0.00	50%
Trg Black (Bed Liner)**	8.08	55.57%	4.4%	51.2%	0.0%	25.00%	0.373	0.375	3.357	4.33	4.14	0.58	13.89	2.53	1.10	0.00	50%
Totals												0.58	13.89	2.53	7.51		

Control Efficiency 99.00%
Potential to Emit After Controls (tons/yr) 0.08

METHODOLOGY

*The 7960 Undercoating is a water based asphalt. Based on the MSDS sheet for this material, the VOC content is assumed 0%, since it is a water based material and the vapor pressure of asphalt is low.
**Bed Liner and Acetone mixed on a 1 to 1 ratio for application

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 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)
Trg 251 Black (Bed Liner)	8.08	0.373	0.375	0.00%	18.00%	0.00	0.89

TOTAL HAPs 0.89

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
Welding and Thermal Cutting**

Company Name: Merhow
Source Address: 306 Depot St, Bristol, Indiana 46507
Administrative Amendment No.: 039-32900-00135
Reviewer: Marcia Earl
Date: March 2013

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)	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) (carbon steel)	6	1.55	223.2	0.0055	0.0005			0.05	0.005	0.0	0.0	0.005
Metal Inert Gas (MIG) (aluminum)	6	0.26	37.44	0.0775	0.0000			0.12	0.000	0.0	0.0	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.17	0.005	0.0	0.0	0.005
Potential Emissions lbs/day								4.13	0.11	0.0	0.0	0.11
Potential Emissions tons/year								0.75	0.02	0.0	0.0	0.02

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
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: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Merhow
Source Address: 306 Depot St, Bristol, Indiana 46507
Administrative Amendment No.: 039-32900-00135
Reviewer: Marcia Earl
Date: March 2013

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	UNIT	MMBtu/hr each	TOTAL MMBtu/hr
1.55	1020	13.31	6 radiant heaters	0.175	1.05
			5 radiant heaters	0.100	0.50
			TOTAL		1.55

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.90	7.60	7.60	0.60	100	5.50	84
Potential Emission in tons/yr	0.01	0.05	0.05	3.99E-03	**see below	0.04	0.56

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

HAPS Calculations

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyd	Hexane	Toluene	
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	1.40E-05	7.99E-06	4.99E-04	1.20E-02	2.26E-05	1.25E-02

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	3.33E-06	7.32E-06	9.32E-06	2.53E-06	1.40E-05	3.65E-05
					Total HAPs	1.26E-02
					Worst HAP	1.20E-02

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 B

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/1,020 MMBtu

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

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	799	0.01531	0.01464
Summed Potential Emissions in tons/yr	799		
CO2e Total in tons/yr	804		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) +

N2O Potential Emission ton/yr x N2O GWP (310).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Matt Hazelbaker
Merhow
306 Depot St
Bristol, IN 46507

DATE: April 26, 2013

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

SUBJECT: Final Decision
Registration - Administrative Amendment
039 - 32900 - 00135

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.


The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
James Heim Bruce Carter Associates
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	LPOGOST 4/26/2013 Merhow 039 - 32900 - 00135 final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Matt Hazelbaker Merhow 306 Depot St Bristol IN 46507 (Source CAATS) Via confirmed delivery										
2		Elkhart County Health Department Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
3		Bristol Town Council and Town Manager P.O. Box 122 Bristol IN 46507 (Local Official)										
4		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
5		James Heim Bruce Carter Associates 616 South 4th Street Elkhart IN 46516 (Consultant)										
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