



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

May 13, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Independent Protection Company, Inc. / F039-10339-00048

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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 13-15-5-3, this permit 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.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require 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
FNPER.dot 9/16/03



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Independent Protection Co., Inc.
Terra Transit: 67819 State Road 15
Turtle Top: 67895 Industrial Drive
New Paris, Indiana 46553**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F039-10339-00048	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 13, 2004 Expiration Date: May 13, 2009

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SECTION A SOURCE SUMMARY

This permit 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, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee 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 Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary specialty van/transport manufacturing source.

Authorized individual:	Vice President
Source Address:	67819 State Road 15, New Paris, IN 46553 67895 Industrial Drive, New Paris, IN 46553
Mailing Address:	67819 State Road 15, New Paris, IN 46553
General Source Phone:	(574) 831-4340
SIC Code:	3713
Source Location Status:	Elkhart
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This specialty van/transport manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 67819 State Road 15, New Paris, IN 46553; and
- (b) Plant 2 is located at 67895 Industrial Drive, New Paris, IN 46553.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this FESOP.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) paint shop operation, constructed in 1975, identified as P1, with a maximum capacity of 3.0 units per hour, utilizing high volume low pressure spray equipment, wiping and dipping as methods of application, equipped with dry filters for particulate control and exhausting to stack S1.
- (b) One (1) vehicle touch-up painting operation, constructed in 1978, identified as P4, with a maximum capacity of 0.25 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.
- (c) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.25 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

- (d) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.12 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.
- (e) One (1) woodworking operation, constructed in 1978, identified as P2, with a flow rate of 2200 acfm, utilizing a cyclone rated at 90% efficiency for particulate control and exhausting to stack S2.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
 - (1) Thirty five (35) space heaters, with a total heat input of 5.187 MMBtu per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (d) Packaging lubricants and greases;
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (f) Cleaners and solvents characterized as having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6[326 IAC 8-3-2] [326 IAC 8-3-5];
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(e)];
- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (l) Paved and unpaved roads and parking lots with public access;
- (m) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;

- (n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (o) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations;
- (p) Filter or coalescer media changeout; and
- (q) Welding of specialty van and truck assembly components.

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit 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 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit 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.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) 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 Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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.
 - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.3 and A.4.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (2) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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 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.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

The Permittee 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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.

- (4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported.

This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) paint shop operation, constructed in 1975, identified as P1, with a maximum capacity of 3.0 units per hour, utilizing high volume low pressure spray equipment, wiping and dipping as methods of application, equipped with dry filters for particulate control and exhausting to stack S1.
- (b) One (1) vehicle touch-up painting operation, constructed in 1978, identified as P4, with a maximum capacity of 0.25 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.
- (c) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.25 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.
- (d) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.12 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total VOC usage at the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.78 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

Compliance with this limitation shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The total usage of any single hazardous air pollutant (HAP) at the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6 shall be limited to less than 10 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The total usage of all hazardous air pollutants (HAPs) at the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6 shall be limited to less than 25 tons per twelve (12) consecutive month period. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.3 PM₁₀ Emission Limitation [326 IAC 2-8-4]

The total solids input to the applicators of the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6, when spray coating, based on 50% transfer efficiency of the air atomization spray gun booths and 75% transfer efficiency of the HVLP spray gun booths, and 98% control efficiency of the dry filters shall be limited as follows:

$$A (1-0.5) (1-0.98) + B (1-0.75) (1-0.98) < 61.01 \text{ tons per year}$$

equivalent to:

$$A + 0.5B < 6101 \text{ tons per year}$$

where:

A = Total solids input at the air atomized air spray guns

B = Total solids input at the HVLP spray guns

Therefore, the total solids input at the air atomized spray gun booths and half of the total solids input at the HVLP spray gun booths, shall not exceed 6101 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to PM/PM₁₀ emissions of less than 100 tons per year from the entire source. Compliance with this limit shall make the requirements of 326 IAC 2-7, Part 70 not applicable.

D.1.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the spray coating in the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation 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:

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

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the spray gun booths shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S1 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed for the presence of overspray emissions from Stack S1 on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and HAP emission limits established in Condition D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount, and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month;

- (4) The total individual and combined HAP usage for each month;
 - (5) The weight of VOCs emitted for each compliance period; and
 - (6) The weight of total individual and combined HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of the amount of solids delivered to the applicators for each month.
 - (c) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, once per day and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (e) One (1) woodworking operation, constructed in 1978, identified as P2, with a flow rate of 2200 acfm, utilizing a cyclone rated at 90% efficiency for particulate control and exhausting to stack S2.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 8.33 pounds per hour when operating at a process weight rate of 5,760 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with condition D.2.1, the baghouse for particulate control shall be in operation and control emissions from the woodworking facility at all times that the woodworking facility is in operation.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Independent Protection Co., Inc.
Source Address: 67819 State Road 15, New Paris, IN 46553
67895 Industrial Drive, New Paris, IN 46553
Mailing Address: 67819 State Road 15, New Paris, IN 46553
FESOP No.: F039-10339-00048

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Independent Protection Co., Inc.
Source Address: 67819 State Road 15, New Paris, IN 46553
67895 Industrial Drive, New Paris, IN 46553
Mailing Address: 67819 State Road 15, New Paris, IN 46553
FESOP No.: F039-10339-00048

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report (I)

Source Name: Independent Protection Co., Inc.
 Source Address: 67819 State Road 15, New Paris, IN 46553
 67895 Industrial Drive, New Paris, IN 46553
 Mailing Address: 67819 State Road 15, New Paris, IN 46553
 FESOP No.: F039-10339-00048
 Facility: paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6
 Parameter: VOC, single and combined HAPs usages
 Limit: (a) total VOC usage at the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.78 tons per twelve (12) consecutive month period
 (b) total usage of any single hazardous air pollutant (HAP) at the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6 shall be limited to less than 10 tons per twelve (12) consecutive month period
 (c) combined usage of all hazardous air pollutants (HAPs) at the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6 shall be limited to less than 25 tons per twelve (12) consecutive month period

YEAR:

Month	Total Input Usage This Month (tons)			Total Input Usage Previous 11 Months (tons)			Total 12-Month Input Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

*List the single HAP with the greatest emission rate

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report (II)

Source Name: Independent Protection Co., Inc.
 Source Address: 67819 State Road 15, New Paris, IN 46553
 67895 Industrial Drive, New Paris, IN 46553
 Mailing Address: 67819 State Road 15, New Paris, IN 46553
 FESOP No.: F039-10339-00048
 Facility: paint shop operation - P1, vehicle touch-up painting operation - P4, terra
 glue operation - P5 and turtle top glue operation - P6
 Parameter: PM/PM-10
 Limit: The total solids input to the applicators of the paint shop operation - P1, vehicle
 touch-up painting operation - P4, terra glue operation - P5 and turtle top glue
 operation - P6, when spray coating, based on 50% transfer efficiency of the air
 atomization spray gun booths and 75% transfer efficiency of the HVLP spray gun
 booths, and 98% control efficiency of the dry filters shall be limited as follows:

$$A (1-0.5) (1-0.98) + B (1-0.75) (1-0.98) < 61.01 \text{ tons per year}$$

where:

A = Total solids input at the air atomized air spray guns

B = Total solids input at the HVLP spray guns

YEAR:

Month	A (tons)	B (tons)	Total Solid Input This Month (tons) A (1-0.5) (1-0.98) + B (1-0.75) (1-0.98)	Total Solid Input Previous 11 Months (tons)	Total 12-Month Solid Input (tons)
Month 1					
Month 2					
Month 3					

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Independent Protection Co., Inc.
Source Address: 67819 State Road 15, New Paris, IN 46553
67895 Industrial Drive, New Paris, IN 46553
Mailing Address: 67819 State Road 15, New Paris, IN 46553
FESOP No.: F039-10339-00048

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit
(FESOP)

Source Background and Description

Source Name:	Independent Protection Co., Inc.
Source Location:	Terra Transit: 67819 State Road 15, New Paris, IN 46553 Turtle Top: 67895 Industrial Drive, New Paris, IN 46553
County:	Elkhart
SIC Code:	3713
Operation Permit No.:	F039-10339-00048
Permit Reviewer:	Seema Roy/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP application from Independent Protection Co., Inc. relating to the operation of a stationary specialty van/transport manufacturing source.

Source Definition

This stationary specialty van/transport manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 67819 State Road 15, New Paris, IN 46553; and
- (b) Plant 2 is located at 67895 Industrial Drive, New Paris, IN 46553.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

All emission units and control devices at this source are unpermitted.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) One (1) paint shop operation, constructed in 1975, identified as P1, with a maximum capacity of 3.0 units per hour, utilizing high volume low pressure spray equipment, wiping and dipping as methods of application, equipped with dry filters for particulate control and exhausting to stack S1.
- (b) One (1) vehicle touch-up painting operation, constructed in 1978, identified as P4, with a maximum capacity of 0.25 units per hour, utilizing air atomization, aerosol cans, tube, wiping and caulking as methods of application, equipped with dry filters for particulate control and exhausting inside the building.
- (c) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.25 units per hour, utilizing air atomization, aerosol cans, tube, wiping and caulking as methods of application, equipped with dry filters for particulate control and exhausting inside the building.

- (d) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.12 units per hour, utilizing air atomization, aerosol cans, tube, wiping and caulking as methods of application, equipped with dry filters for particulate control and exhausting inside the building.
- (e) One (1) woodworking operation, constructed in 1978, identified as P2, with a flow rate of 2200 acfm, utilizing a cyclone rated at 90% efficiency for particulate control and exhausting to stack S2.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
 - (1) Thirty five (35) space heaters, with a total heat input of 5.187 MMBtu per hour.
- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (c) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight;
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (f) Packaging lubricants and greases;
- (g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (h) Cleaners and solvents characterized as having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F);
- (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6[326 IAC 8-3-2] [326 IAC 8-3-5];
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(e)];
- (k) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (l) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

- (n) Paved and unpaved roads and parking lots with public access;
- (o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (q) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations;
- (r) Filter or coalescer media changeout; and
- (s) Welding of specialty van and truck assembly components.

Existing Approvals

The source has been operating without any previous approvals.

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.

Recommendation

The staff recommends to the Commissioner that the FESOP 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.

An administratively complete FESOP application for the purposes of this review was received on November 19, 1998. Additional information was received on December 21, 2003 and February 5, 2004.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 11).

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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.”

Pollutant	Potential to Emit (tons/yr)
PM	Greater than 100, less than 250
PM-10	Greater than 100, less than 250
SO ₂	Less than 100
VOC	Greater than 100, less than 250
CO	Less than 100
NO _x	Less than 100

HAPs	Potential to Emit (tons/yr)
Specify the HAP	
MEK	Less than 10
Toluene	Greater than 10
Ethylbenzene	Less than 10
Xylene	Greater than 10
MMA	Less than 10
Trichloroethylene	Less than 10
Perchloroethylene	Less than 10
Diethylene Ether	Less than 10
1,2 Butylene Oxide	Less than 10
Methanol	Less than 10
Total	Greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) 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.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units. Any control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the Permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operations	2.36 ⁽¹⁾	2.36 ⁽¹⁾	-	<99.78 ⁽²⁾	-	-	<10 (single) <25 (total)
Woodworking Facility	36.49 ⁽³⁾	36.49 ⁽³⁾	-	-	-	-	-
Insignificant Activities	2.27	2.40	0.01	0.12	1.91	2.27	Negligible
Total Emissions	3.87	1.49	0.01	<99.9	0.74	0.88	<10 (single) <25 (total)

- (1) Reflects the use of particulate matter control devices which shall be operated at all times the processes are in operation. Assumes all PM equal to PM₁₀.
- (2) Based on limited VOC usage for surface coating applications, which requires limiting the potential to emit of VOC to less than 100 tons per 12 consecutive month period such that the requirement of 326 IAC 2-7 shall not apply.
- (3) Reflects the PM and PM-10 emissions based on 326 IAC 6-3-2 (e) allowable and 8760 hours of operation per year.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Elkhart County has been classified as attainment or unclassifiable for remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Federal Rule Applicability

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

This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.390, Subpart MM), because the source is not considered an automobile or light duty truck assembly plant.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61, and 326 IAC 20 and 40 CFR Part 63) applicable to this source since the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2. The source shall continue to limit coating material usage such that single and combined HAP emissions are limited to less than 10 tons per year and 25 tons per year, respectively, and remain an area source of HAPs pursuant to 40 CFR Part 63.2.
- (1) The source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart MMMM for Miscellaneous Metal Parts and Products Surface Coating). The provisions of this Subpart apply to a source that uses at least 250 gallons of material (includes paints, sealants, caulks, inks, adhesives, and maskants) per year for the coating of miscellaneous metal; and that is a major source, is located at a major source, or is part of a major source of emissions of HAPs, as defined at 40 CFR 63.2. As a FESOP source, this plant will not be subject to the NESHAP for source categories, 326 IAC 20, (40 CFR 63, Subpart MMMM), *National Emission Standards for Miscellaneous Metal Part and Products*, for its metal parts coating processes since the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2.
- (2) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63.4480, Subpart PPPP (Surface Coating of Plastic Parts and Products and (326 IAC 20-1-1)), effective the date the rule is published in the Federal Register. The provisions of this Subpart apply to a source that uses 378 liters (100 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAPs) in the surface coating of plastic parts and products; and that is a major source, is located at a major source, or is part of a major source of emissions of HAPs, as defined at 40 CFR 63.2. As a FESOP source, this plant will not be subject to the NESHAP for source categories, 326 IAC 20, (40 CFR 63, Subpart PPPP), *National Emission Standards for Surface Coating of Plastic Parts and Products*, for its plastic parts coating processes since the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2.
- (3) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart QQQQ for Wood Building products Surface Coating), effective as of May 28, 2003, because as a FESOP source the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2.
- (4) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.800, Subpart JJ. The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR 63, subpart A. As a FESOP source the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2. Therefore, the requirements of this rule do not apply to this source.

- (5) The parts degreasing operation that includes wash tanks with capacities each less than 145 gallons, as an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T). Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent. This source does not use the regulated halogenated solvents in the degreasing operation; therefore, Subpart T does not apply.
- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because it is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs, after enforceable controls and/or limitations).
- (d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
 - (1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) The unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

Pursuant to 326 IAC 2-2 (PSD), this source originally constructed prior to the August 28, 1977 rule applicability date with modifications thereafter, is not considered a major source because it does not have the potential to emit 250 tons per year of any criteria pollutant and it is not one of the 28 listed source categories. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

All the coating operations for this source were constructed before the July 27, 1997 rule applicability date and as a FESOP source the source shall limit its single and combined HAP emissions to less than 10 tpy and 25 tpy, respectively, at the coating operations. Therefore the requirements of this rule do not apply to this source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located Elkhart County and it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, 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 submission should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule the following condition shall apply to this specialty van/transport manufacturing source.

- (a) The usage of VOCs delivered to the applicators plus the amount of VOCs used for clean-up solvents shall be limited to less than 99.78 tons per twelve (12) consecutive month period. This usage limit is required to limit the source wide potential to emit of VOC to less than 100 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.
- (b) The usage of any single HAP delivered to the applicators plus the usage of any single HAP used for clean-up solvents shall be limited to less than 10 tons per twelve (12) consecutive month period. The usage of any combination of HAPs delivered to the applicators plus the usage of any combination of HAPs used for clean-up solvents shall be limited to less than 25 tons per twelve (12) consecutive month period. These usage limits are required to limit the source wide potential to emit of any single HAP and any combination of HAPs to less than 10 tons and 25 tons, respectively, per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.
- (c) The total solids input to the applicators of the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6, when spray coating, based on 50% transfer efficiency of the air atomization spray gun booths and 75% transfer efficiency of the HVLP spray gun booths, and 98% control efficiency of the dry filters shall be limited as follows:

$$A (1-0.5) (1-0.98) + B (1-0.75) (1-0.98) < 61.01 \text{ tons per year}$$

equivalent to:

$$A + 0.5B < 6101 \text{ tons per year}$$

where:

A = Total solids input at the air atomized air spray guns

B = Total solids input at the HVLP spray guns

Therefore, the total solids input at the air atomized spray gun booths and half of the total solids input at the HVLP spray gun booths, shall not exceed 6101 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to PM/PM₁₀ emissions of less than 100 tons per year from the entire source. Compliance with this limit shall make the requirements of 326 IAC 2-7, Part 70 not applicable.

- (d) Based on 8760 hours of operation at rated capacity for twelve (12) month period, the PM₁₀ emissions from the woodworking operation P2 shall be limited to 36.49 tons. Compliance with this limit shall limit the source-wide potential to emit of PM₁₀ to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 are not applicable.

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 the 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.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from spray coating in the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6 shall each be limited by the following:

Interpolation 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:

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

Under the rule, particulate from the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The source shall comply with this requirement by continuing to use dry filters for each coating operation.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation - P2 shall not exceed 8.33 pounds per hour when operating at a process weight rate of 5,760 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

The woodworking operation is equipped with a cyclone for particulate control. The maximum uncontrolled particulate emission rate from the woodworking operation is 18.86 pounds per hour, and with a cyclone with 90% control efficiency, the maximum controlled particulate emission rate from the woodworking operation is 1.89 pounds per hour, which is less than 8.33 pounds of particulate per hour. Therefore, the woodworking operation shall comply with 326 IAC 6-3-2 by using a cyclone for particulate control at all times during operation.

(c) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This includes the following activities:

- (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (2) Welding of specialty van and truck assembly components.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. This rule does not apply to this source because all the surface coating operations were constructed before the January 1, 1980 rule applicability date.

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

This rule applies to facilities existing as of November 1, 1980, located in specifically listed counties, located at sources which have potential emissions of hundred (100) tons or greater per year of VOC. This source is not subject to this rule because all the equipment for this source were constructed before 1980 and it is not located in one of the specifically listed counties.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), facilities constructed in a listed county before November 1, 1980, which are located at a source with potential emissions of 100 tons per year or more of VOC, and which meet the criteria of 326 IAC 8-2-12(a), shall comply with the applicable requirements of 326 IAC 8-2-12. Facilities existing in specifically listed counties as of July 1, 1990, or that are newly constructed in any county after July 1, 1990, with actual emissions of greater than 15 pounds of VOC per day before add-on controls, shall likewise comply with the applicable requirements of 326 IAC 8-2-12.

The surface coating facilities, P1, P4, P5 and P6 constructed in 1975, 1978, 1964 and 1964, respectively, are not subject to this rule because they were all constructed before 1980 and are not located in one of the specifically listed counties.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This rule is not applicable because the source began operation prior to October 7, 1974. In addition, the potential VOC emissions from the source are less than 100 tons per year.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Elkhart County. Therefore, this rule is not applicable to this source.

Testing Requirements

Compliance testing is not required of this source. The coating material usage and related VOC and volatile organic HAP emissions are based on an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation and the woodworking operation is controlled by a cyclone with particulate emissions below the relevant allowable particulate matter emission rates, and the source shall comply with the relevant control technology operating, monitoring, and record keeping requirements.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The paint shop operation, P1, the vehicle touch-up painting operation, P4, the terra glue operation, P5 and the turtle top glue operation, P6, have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S1 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the surface coating facilities must operate properly to ensure compliance with 326 IAC 5-1 (Opacity), 326 IAC 6-3-2 (Process Operations), and 326 IAC 2-8-4 (FESOP).

There are no specific compliance monitoring requirements applicable to the woodworking operation, P2, because it has a cyclone as a control device and the allowable emissions for the controlled pollutant are less than 10 lb/hr.

Conclusion

The operation of this specialty van/transport manufacturing source shall be subject to the conditions of the attached proposed FESOP No. **F039-10339-00048**.

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

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit
(FESOP)

Source Background and Description

Source Name:	Independent Protection Co., Inc.
Source Location:	Terra Transit: 67819 State Road 15, New Paris, IN 46553 Turtle Top: 67895 Industrial Drive, New Paris, IN 46553
County:	Elkhart
SIC Code:	3713
Operation Permit No.:	F039-10339-00048
Permit Reviewer:	Seema Roy/EVP

On March 11, 2004, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana 46527, stating that Independent Protection, Co., Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary specialty van/transport manufacturing source. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 26, 2004, Gregory W. Clark of GAI Consultants, Inc. submitted comments on behalf of Independent Protection, Co., Inc. on the proposed FESOP. The summary of the comments is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment #1

A.1 Change phone number to 574-831-4340.

Response #1

A.1 has been revised as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary specialty van/transport manufacturing source.

Authorized individual:	Vice President
Source Address:	67819 State Road 15, New Paris, IN 46553 67895 Industrial Drive, New Paris, IN 46553
Mailing Address:	67819 State Road 15, New Paris, IN 46553
General Source Phone:	(574) 533-4116 (574) 831-4340
SIC Code:	3713
Source Location Status:	Elkhart
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

Comment #2

A.3 (b) and D.1 (b)

To clarify that only air atomization spray guns are equipped with dry filters for particulate control, please revise these process descriptions to the following:

“One (1) vehicle touch-up painting operation, constructed in 1978, identified as P4, with a maximum capacity of 0.25 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside building.”

Response #2

Conditions A.3 (b) and D.1 (b) have been revised as follows:

- (b) One (1) vehicle touch-up painting operation, constructed in 1978, identified as P4, with a maximum capacity of 0.25 units per hour, utilizing air atomization **equipped with dry filters for particulate control**, aerosol cans, tube, wiping and caulking as methods of application, ~~equipped with dry filters for particulate control~~ and exhausting inside the building.

Comment #3

A.3 (c) and D.1 (c)

To clarify that only air atomization spray guns are equipped with dry filters for particulate control, please revise these process descriptions to the following:

“One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.25 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside building.”

Response #3

Conditions A.3 (c) and D.1 (c) have been revised as follows:

- (c) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.25 units per hour, utilizing air atomization **equipped with dry filters for particulate control**, aerosol cans, tube, wiping and caulking as methods of application, ~~equipped with dry filters for particulate control~~ and exhausting inside the building.

Comment #4

A.3 (d) and D.1(d)

To clarify that only air atomization spray guns are equipped with dry filters for particulate control, please revise these process descriptions to the following:

“One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.12 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside building.”

Response #4

Conditions A.3 (d) and D.1 (d) have been revised as follows:

- (d) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.12 units per hour, utilizing air atomization **equipped with dry filters for particulate control**, aerosol cans, tube, wiping and caulking as methods of application, ~~equipped with dry filters for particulate control~~ and exhausting inside the building.

Comment #5

A.4 (b) and (c) Please delete these two insignificant activities. IPCI does not have any combustion sources using propane, LP gas, butane or fuel oil.

Response #5

Conditions A.4 (b) and (c) have been deleted as follows:

- ~~(b) Propane or liquefied petroleum gas, or butane fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;~~
- ~~(c) Fuel oil fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five tenths (0.5) percent sulfur by weight;~~

Comment #6

B.15 (b) Correct the spelling of the word after OAQ to "determines".

Response #6

Condition B.15 (b) has been revised as follows:

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ ~~termines~~ **determines** any of the following:

Comment #7

C.13 Please delete this condition. 326 IAC 1-5-2 requires a source that has the potential to emit 100 tons per year or more, of any pollutant, to submit a written Emergency Reduction Plan. As shown in the "Potential to Emit After Issuance" table in the Technical Support Document (TSD), the federally enforceable controls and limits in Section D of the FESOP effectively limit the potential to emit any pollutant to less than 100 tons per year. Therefore, this source does not have the potential to emit 100 tons per year or more of any pollutant, and 326 IAC 1-5-2 does not apply.

Response #7

OAQ agrees. Condition C.13 has been deleted from the FESOP and the section has been renumbered.

~~C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~
~~Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~within ninety (90) days from the date of issuance of this permit.~~

Comment #8

C.17 Please delete this condition. Under the recently revised rule, 326 IAC 2-6 the facility is excluded from having to submit an annual emission statement. See <http://www.in.gov/idem/air/programs/emissions/emissprog/updates.html>

Response #8

OAQ agrees. Since the source qualifies for a FESOP and it does not emit 5 tons per year or more of lead, it is not required to submit an emission statement. Therefore, condition C.17 has been deleted as follows:

~~C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]~~

~~(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b) The emission statement required by this permit 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.~~

Comment #9

D.1.3 Please delete this condition, since it is redundant and overly burdensome. Condition D.1.1 already limits VOC usage to less than 100 tons per year. As indicated by recent data supplied to IDEM, the ITW Flexis MA 422 two-part adhesive has the highest solids content of any coating applied by IPCI using a spray gun. Assuming the worst-case condition that all VOCs from the facility are from air atomization spray gun coating using ITW Flexis MA 422, the maximum potential PM/PM10 can be calculated as follows:

$$\text{PM/PM10 (tons/yr)} = (100 \text{ tons VOC/yr}) \times (S/V) \times (100-T)/100 \times (100-E)/100$$

Where S = % solids by weight in ITW Flexis MA422, as applied
V = % VOC by weight in ITW Flexis MA422, as applied
T = % transfer efficiency of air atomization spray gun booth
E = % control efficiency of dry filters

Therefore,

$$\begin{aligned} \text{PM/PM10 (tons/yr)} &= (100 \text{ tons VOC/yr}) \times (95.4\% \text{ solids}/4.6\% \text{ VOC}) \times (1-0.5) \times (1-.98) \\ &= 20.74 \text{ tons solids/yr} \end{aligned}$$

Therefore, the VOC limit in condition D.1.1 effectively limits PM/PM10 to less than 20.74 tons/yr, which is significantly less than the limit proposed in D.1.3.

Secondly, IDEM has not imposed such limits on facilities with similar operations. See permits F039-12933-00255, F039-17521-00407, F003-15012-00235 and F003-13899-00208.

Response #9

Independent Protection Co., Inc. has an uncontrolled PM/PM-10 PTE for paint overspray of 202.9 tons per year and 13 tons per year after control. Since there is no restriction on paint formulations and they can vary, an enforceable limitation with documentation is required to assure compliance with FESOP emission limits. Therefore, no change has been made as a result of this comment. Permits F039-12933-00255, F039-17521-00407 and F003-13899-00208 have uncontrolled PM/PM-10 PTE for paint overspray of less than 100 tons per year. A limit on solids input was erroneously omitted from permit F003-15012-00235.

Comment #10

D.1.5 Please change the words “. . .*surface coating* . . .” to “. . .*spray gun booth* . . .”. As described in sections A.3 and D.1, surface coating processes at the facility include tube, wiping, dipping, and caulking methods of application. These surface coating application methods do not produce a spray that would require particulate control.

Response #10

Condition D.1.5 has been revised as follows:

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the ~~surface coating processes~~ **spray gun booths** shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Comment #11

D.1.7 Please replace the words “. . . *by preparing or obtaining from the manufacturer the copies of the 'as supplied' and 'as applied' VOC data sheets.*” with “. . . *using formulation data supplied by the coating manufacturer.*”

326 IAC 8-1-2(a) requires that VOC content data be maintained for each coating, ink, and solvent without regard to the format in which it is maintained. Most manufacturers provide the required VOC content data in their Material Safety Data Sheets (MSDS). To comply with the record keeping requirements under condition D.1.9 of the permit it is most practical for IPCI to maintain the required VOC content data in an electronic database or spreadsheet to facilitate the monthly VOC and HAP usage calculations. To specify that “as supplied” and “as applied” VOC data sheets must be maintained (1) requires a duplication of effort, (2) is overly burdensome, and (3) does not protect the environment. Therefore, IPCI is requesting the requirement to maintain “as supplied” and “as applied” VOC data sheets be deleted.

326 IAC 8-1-4(a)(3) allows, subject to IDEM’s approval, the use of formulation data in determining compliance with VOC content and usage limitations. To indicate IDEM’s approval for the use of formulation data, IPCI is requesting that it be clearly stated that IPCI can use formulation data in determining compliance with VOC content and usage limitations. This requested revision is consistent with language of identical conditions in permits F039-12933-00255, F039-17521-00407, F003-15012-00235 and F003-13899-00208.

Response #11

Condition D.1.7 has been revised as follows:

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 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~~ **using formulation data supplied by the coating manufacturer**. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Comment #12

D.1.8 (a)

Please note there is only one surface coating booth associated with Stack S1. Accordingly, please replace the words “. . . S1 while one or more of the booths are in operation.” with “. . . S1 while the booth is in operation.”

Response #12

Condition D.1.8 (a) has been revised as follows:

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S1 while ~~one or more of the booths are~~ **the booth is in operation**. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Comment #13

D.1.8(b)

To clarify what is to be inspected, please change the first sentence to read as follows:

“Monthly inspection shall be performed for the presence of overspray emissions from Stack S1 on nearby rooftops and ground. “

Response #13

Condition D.1.8 (b) has been revised as follows:

- (b) Monthly inspections shall be performed ~~of the coating emissions from the stack and the presence of overspray~~ **for the presence of overspray emissions from Stack S1** on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Comment #14

D.1.9(b) and FESOP Quarterly Report (II)

Please delete this condition for reasons discussed above under D.1.3.

Response #14

No change has been made as a result of this comment for the reasons mentioned under response # 9.

Comment #15

D.1.10 Please delete reference to Condition D.1.3 for reasons discussed above under D.1.3.

Response #15

No change has been made as a result of this comment for the reasons mentioned under response # 9.

Appendix A: Emission Calculations

Company Name: Independent Protection Co., Inc.
Address City IN Zip: Terra Transit: 67819 State Road 15, New Paris, IN
 Turtle Top: 67895 Industrial Drive, New Paris, IN
FESOP No.: F039-10339-00048
Reviewer: Seema Roy / EVP

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Surface Coating Operations	Welding Operations	Woodworking Operations	TOTAL
PM	0.04	117.91	2.23	82.59	202.8
PM10	0.17	117.91	2.23	82.59	202.9
SO2	0.01	0.00	0.00	0.00	0.0
NOx	2.27	0.00	0.00	0.00	2.3
VOC	0.12	163.7	0.00	0.00	163.8
CO	1.91	0.00	0.00	0.00	1.9
total HAPs	negl.	74.58	0.00	0.00	74.6
worst case single HAP	negl.	69.48	0.00	0.00	69.5
Total emissions based on rated capacity at 8,760 hours/year.					
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Surface Coating Operations	Welding Operations	Woodworking Operations	TOTAL
PM	0.04	2.36	2.23	8.26	12.9
PM10	0.17	2.36	2.23	8.26	13.0
SO2	0.01	0.00	0.00	0.00	0.0
NOx	2.27	0.00	0.00	0.00	2.3
VOC	0.12	<99.78	0.00	0.00	<99.9
CO	1.91	0.00	0.00	0.00	1.9
total HAPs	negl.	<25	0.00	0.00	<25
worst case single HAP	negl.	<10	0.00	0.00	<10

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.

**Appendix A: Emission Calculations
HAP Emission Calculations**

Paint Shop Operation - P1

Company Name: Independent Protection Co., Inc.
Address City IN Zip: Terra Transit: 67819 State Road 15, New Paris, IN
 Turtle Top: 67895 Industrial Drive, New Paris, IN
FESOP No.: F039-10339-00048
Reviewer: Seema Roy / EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Toluene	Weight % Ethylbenzene	Weight % Xylene	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
7900 S/7975S Mix	8.1	0.18000	0.300	4.00%	8.00%	4.40%	20.00%	0.08	0.15	0.08	0.38	0.69
801J Mix	7.8	0.93000	0.300	5.00%	30.00%	2.90%	19.00%	0.47	2.85	0.28	1.80	5.40
806 J Mix	7.3	0.14000	0.300	5.00%	30.00%	3.80%	36.00%	0.07	0.40	0.05	0.48	1.00
807 J Mix	7.2	0.07700	0.300	5.00%	30.00%	4.30%	35.00%	0.04	0.22	0.03	0.26	0.54
Variprime 15	8.3	0.04700	0.300	0.00%	15.00%	0.00%	0.00%	0.00	0.08	0.00	0.00	0.08
Tie Coat	7.1	0.02800	0.300	0.00%	35.00%	3.00%	15.00%	0.00	0.09	0.01	0.04	0.14
Imron Black	8.3	0.01400	0.300	0.00%	3.00%	0.70%	4.00%	0.00	0.00	0.00	0.01	0.01
DX 440	6.6	0.01600	0.300	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner	7.0	0.26000	0.300	0.00%	60.00%	0.00%	0.00%	0.00	1.44	0.00	0.00	1.44
Uncontrolled Potential Emissions								0.94	5.70	0.56	3.60	10.80

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
 Note: The emissions from the worst case coating are multiplied by 2 because paint shop P1 is equipped with two spray guns and the same coating could be applied using the two spray guns or two coatings could be applied simultaneously with one coating per spray gun.

**Appendix A: Emission Calculations
HAP Emission Calculations**

Terra Surface Coating and Glue Operations (P4 and P5)

Company Name: Independent Protection Co., Inc.
Address City IN Zip: Terra Transit: 67819 State Road 15, New Paris, IN
 Turtle Top: 67895 Industrial Drive, New Paris, IN
FESOP No.: F039-10339-00048
Reviewer: Seema Roy / EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Toluene	Weight % Ethylbenzene	Weight % Xylene	Weight % MMA	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MMA Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Polyurathane Foam	10.2	2.40000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Formica Cement	6.7	5.20000	0.250	0.10%	14.30%	0.00%	0.00%	0.00%	0.04	5.44	0.00	0.00	0.00	5.47
Black Frame Primer	9.3	3.86000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Sikaflex 252	9.8	2.24000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Wood Glue	9.2	0.65000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner	7.0	1.46000	0.250	0.00%	60.00%	0.00%	0.00%	0.00%	0.00	6.73	0.00	0.00	0.00	6.73
Pro 2000 Adhesive	8.3	0.93000	0.250	0.00%	0.00%	5.00%	30.00%	0.00%	0.00	0.00	0.42	2.55	0.00	2.97
Z-Tech Undercoating	10.4	0.25000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Bart B 363	5.7	0.41000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Self-leveling Sealant	10.7	0.34000	0.250	0.00%	0.00%	8.90%	0.00%	0.00%	0.00	0.35	0.00	0.00	0.00	0.35
Acetone	6.6	0.23000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Glass Cleaner	9.2	0.11000	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Benders Undercoating	6.7	0.07900	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
3M Contact Cement	6.6	0.06900	0.250	0.00%	8.00%	0.00%	0.00%	0.00%	0.00	0.04	0.00	0.00	0.00	0.04
Citrus Cleaner	8.3	0.06600	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Mineral Spirits	6.5	0.05700	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
MA 422	8.4	0.05000	0.250	0.00%	0.00%	0.00%	0.00%	50.00%	0.00	0.00	0.00	0.00	0.23	0.00
98-3	7.5	0.02900	0.250	0.00%	15.92%	0.00%	0.00%	0.00%	0.00	0.04	0.00	0.00	0.00	0.04
Silicone Caulk	8.7	0.02800	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Furniture Polish	8.1	0.02400	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Uncontrolled Potential Emissions									0.24	40.38	2.52	15.30	1.38	40.38

Add worst case coating to all solvents

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

Note: The emissions from the worst case coating are multiplied by 6 because the Terra operation has six work stations, each equipped with one spray gun and the same coating could be applied at all the six work stations simultaneously.

**Appendix A: Emission Calculations
HAP Emission Calculations**

Turtle Top Operation - P6

Company Name: Independent Protection Co., Inc.
Address City IN Zip: Terra Transit: 67819 State Road 15, New Paris, IN
Turtle Top: 67895 Industrial Drive, New Paris, IN
FESOP No.: F039-10339-00048
Reviewer: Seema Roy / EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Toluene	Weight % Ethylbenzene	Weight % Xylene	Weight % MMA	Weight % Trichloroethylene	Weight % Perchloroethylene	Weight % Diethylene ether	Weight % 1,2 Butylene Oxide	Weight % Methanol	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MMA Emissions (ton/yr)	Trichloroethylene Emissions (ton/yr)	Perchloroethylene Emissions (ton/yr)	Diethylene ether Emissions (ton/yr)	1,2 Butylene Oxide Emissions (ton/yr)	Methanol Emissions (ton/yr)	
Sikaflex 252	9.8	1.61000	0.120	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Benders # 2 Solvent	7.3	1.29000	0.120	0.00%	95.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	4.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ADPRO	7.1	0.89000	0.120	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Wood Glue	9.2	0.62000	0.120	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00
BAS 55 Bulk Adhesive	6.3	0.56000	0.120	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fabric Cleaner	10.0	0.36000	0.120	0.00%	0.00%	0.00%	0.00%	0.00%	25.52%	49.60%	0.60%	0.10%	0.00%	0.00	0.00	0.00	0.00	0.00	0.48	0.94	0.01	0.00	0.00	0.00
Red Bulk Adhesive	6.7	0.28000	0.120	6.90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WD 40	6.7	0.18000	0.120	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00
98-3	7.5	0.17000	0.120	0.00%	15.92%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MA 422	8.4	0.14000	0.120	0.00%	0.00%	0.00%	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Glass Cleaner	9.2	0.13000	0.120	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kwikfoam	10.0	0.12000	0.120	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Silicone Caulk	8.7	0.07600	0.120	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00
USC 51020	7.3	0.06600	0.120	0.00%	0.00%	1.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Uncontrolled Potential Emissions			Add worst case coating to all solvents											0.35	23.40	0.00	0.05	1.55	2.40	4.70	0.05	0.00	0.05	

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

Note: The emissions from the worst case coating are multiplied by 5 because the Turtle Top operation has five work stations, each equipped with one spray gun and the same coating could be applied at all the five work stations simultaneously.

1 TSD AppA

Total HAP Emissions (ton/yr)
0.00
4.68
0.00
0.00
0.00
0.00
0.07
0.00
0.11
0.00
0.00
0.00
0.00
0.02
23.40

Appendix A: Woodworking Particulate Emissions

Company Name: Independent Protection Company, Inc.
Address City IN Zip: Terra Transit: 67819 State Road 15, New Paris, IN
 Turtle Top: 67895 Industrial Drive, New Paris, IN
FESOP : 039-10339-00048
Reviewer: Seema Roy

Uncontrolled Potential Emissions (tons/year)					
A. Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (Square Feet) (ACFM)	Control Efficiency	Total (tons/yr)
P2	1	0.10000	2200.0	90.00%	82.59
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					82.59
Controlled Potential Emissions (tons/year)					
A. Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (Square Feet) (ACFM)	Control Efficiency	Total (tons/yr)
P2	1	0.10000	2200.0	90.00%	8.26

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source control:

8.26

Methodology:Potential (uncontrolled):

Emissions rate (PM) = PM after controls (ton/yr)/(1-control efficiency)

Potential (controlled):

Emissions rate (PM) = Grain loading per actual cubic foot of air outlet (gr/cf)*Air flow rate in actual cubic feet per minute*60 minutes per hour/7000 grains per pound/2000 pounds*8760 hours per year.

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

Thirty-Five (35) Space Heaters

**Company Name: Independent Protection Co., Inc.
Address City IN Zip: Terra Transit: 67819 State Road 15, New Paris, IN
Turtle Top: 67895 Industrial Drive, New Paris, IN
FESOP No.: F039-10339-00048
Reviewer: Seema Roy / EVP**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

5.2

45.4

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.17	0.01	2.27	0.12	1.91

*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

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

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

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

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

Thirty-Five (35) Space Heaters

**Company Name: Independent Protection Co., Inc.
 Address City IN Zip: Terra Transit: 67819 State Road 15, New Paris, IN
 Turtle Top: 67895 Industrial Drive, New Paris, IN
 FESOP No.: F039-10339-00048
 Reviewer: Seema Roy / EVP**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.771E-05	2.726E-05	1.704E-03	4.089E-02	7.724E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.136E-05	2.499E-05	3.181E-05	8.633E-06	4.771E-05

Methodology is the same as page 9.

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

