Mr. John Greiwe
Batesville Manufacturing, Inc. (Options Plant)
705 East Pearl Street
Batesville, Indiana 47006

Re: **137-12307-00016**
First Minor Source Modification to
Part 70 No.: T137-7280-00016

Dear Mr. Greiwe:

Batesville Manufacturing, Inc. (Options Plant) applied for a Part 70 Operating Permit on November 25, 1996 for a burial caskets and urns manufacturing plant. A letter requesting changes to this permit was received on May 23, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a minor source modification to this permit is hereby approved as described in the attached Technical Support Document.

(a) One (1) inner panel spray booth, identified as IPB, with a maximum capacity of 2 panels per hour, using dry filters as control, and exhausting to stack #14-EF-74.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Phillip Ritz, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for extension (3-6878), or dial (973) 575-2555, extension 3241.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PR/EVP
cc: File - Ripley County
U.S. EPA, Region V
Ripley County Health Department
Air Compliance Section Inspector - D.J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 MINOR SOURCE MODIFICATION
OFFICE OF AIR MANAGEMENT

Batesville Manufacturing, Inc.
1000 East Pearl Street
Batesville, Indiana 47006

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval 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 2-7 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.

Source Modification No.: MSM 137-12307-00016	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary burial caskets and urns manufacturing plant.

Responsible Official:	Denny W. Knigga (Assembly and Stamping Plants) John Greiwe (Options Plant)	
Source Address:	(1)	Assembly Plant 1000 East Pearl Street, Batesville, Indiana 47006
	(2)	Options Plant 705 East Pearl Street, Batesville, Indiana 47006
	(3)	Stamping Plant 100 Eastern Avenue, Batesville, Indiana 47006
Mailing Address:	1000 East Pearl Street, Batesville, Indiana 47006	
SIC Code:	3995	
County Location:	Ripley	
County Status:	Attainment for all criteria pollutants	

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

(a) One (1) inner panel spray booth, identified as IPB, with a maximum capacity of 2 panels per hour, using dry filters as control, and exhausting to stack #14

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [40CFR 124]

Pursuant to 40 CFR 124.15, 40 CFR 124.19, and 40 CFR 124.20, the effective date of this permit will be thirty-three (33) days after issuance.

B.4 Revocation of Permits [326 IAC 2-2-8]

Pursuant to 326 IAC 2-2-8(a)(1), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of eighteen (18) months or more.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official 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, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, 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;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM,. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

(b) Any application requesting an amendment or modification of this approval shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

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

(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.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, 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, OAM.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
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 Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.7 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.8 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.9 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this approval;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this approval shall be submitted to:

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

(b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval 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, OAM, on or before the date it is due.

(c) Unless otherwise specified in this approval, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(a) One (1) inner panel spray booth, identified as IPB, with a maximum capacity of 2 panels per hour, using dry filters as control, and exhausting to stack #14-EF-74.

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC potential emissions from this facility are less than two (2) tons per month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification which may increase VOC potential emissions to 25 tons per year or more from this facility shall obtain OAM approval before such change may occur.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

The combined HAP potential emissions from this facility are less than two (2) tons per month, and individual HAP potential emissions are less than 0.8 tons per pollutant per month. Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification which may:

(a) increase individual HAP potential emissions to 10 tons per year or more, or
(b) increase combined HAP potential emissions to 25 tons per year or more

from this facility shall obtain OAM approval before such change may occur.

D.1.3 PSD Minor Modification Limit [326 IAC 2-2] [40 CFR 52.21]

The VOC potential emissions from this facility are less than 40 tons per year. Therefore, the PSD requirement in 326 IAC 2-2 (PSD) does not apply. Any change or modification which may increase VOC potential emissions to 40 tons per year or more from this facility shall obtain OAM approval before such change may occur.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the inner panel spray booth shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 VOC Emissions

Compliance with Conditions D1.1(a) and D.1.2 (a) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly.

(1) The amount and VOC 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.
(2) The VOC content of the coatings used;
(3) The cleanup solvent usage for each month; and
(4) The total VOC usage for each month.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

The Permittee is not required to submit reports on this facility by this permit. However, IDEM may require reporting when necessary to determine if the facility is in compliance. If reporting is required by IDEM, reports shall be submitted in accordance with Section C - General Reporting Requirements.

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

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Batesville Manufacturing, Inc.
Source Address: 705 East Pearl Street, Batesville, IN 47006 (Plant #2, Options Plant)
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006
Source Modification No.: MSM 137-12307-00016

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

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 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:

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Batesville Manufacturing, Inc. (Options Plant)
705 East Pearl Street
Batesville, Indiana 47006

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that Batesville Manufacturing, Inc. (Options Plant), 705 East Pearl Street, Batesville, Indiana 47006, has constructed the inner panel spray booth, identified as IPB in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on May 23, 2000 and as permitted pursuant to **Permit Modification No.: 137-12307-00016** issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Batesville Manufacturing, Inc. (Options Plant)
Source Location:	705 East Pearl Street, Batesville, Indiana 47006
County:	Ripley
SIC Code:	3995
Operation Permit No.:	T137-7280-00016
Source Modification No.:	MSM 137-12307-00016
Permit Reviewer:	Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed a modification application from Batesville Manufacturing, Inc. (Options Plant) relating to the operation of the modification to a burial caskets and urns manufacturing plant.

History

On May 23, 2000, Batesville Manufacturing, Inc. (Options Plant) submitted an application to the OAM requesting to add additional surface coating lines to their existing plant. Batesville Manufacturing, Inc. (Options Plant) applied for a Part 70 Operating Permit on November 25, 1996.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

(a) One (1) inner panel spray booth, identified as IPB, with a maximum capacity of 2 panels per hour, using dry filters as control, and exhausting to stack #14-EF-74.

Insignificant Activities

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

(a) Infrared cure equipment.

Existing Approvals

The source applied for a Part 70 Operating Permit (T137-7280-00016) on November 25, 1996. The source has since received the following:

(a) Construction Permit No. 137-10452-00016, issued on April 29, 1999.

Source Definition

This metal caskets manufacturing source consists of three (3) plants:

(1) Plant #1 (Assembly Plant) is located at 1000 East Pearl Street, Batesville, Indiana 47006.

(2) Plant #2 (Options Plant) is located at 705 East Pearl Street, Batesville, Indiana 47006.

(3) Plant #3 (Stamping Plant) is located at 100 Eastern Avenue, Batesville, Indiana 47006.

Plants #2 and #3 are located adjacent to each other and Plant #1 is located nearby (within 0.5 miles distance). The three (3) plants are owned and operated by one (1) company, have the same SIC codes, and more than 50% of the products in Plant #2 are shipped to Plant #1. Therefore, the three (3) plants are considered as one (1) source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
#14-EF-74	Inner Panel Spray Booth IPB	24	1.25	3,750	Ambient
#14-EF-75	Drying Oven	24	0.5	200	Ambient

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification, 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 application for the purposes of this review was received on May 23, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 and 2.)

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	2.69
PM-10	2.69
SO_2	0.00
VOC	5.69
CO	0.00
NO_x	0.00

HAP's	Potential To Emit (tons/year)
Cumene	less than 10
Xylene	less than 10
Toluene	less than 10
Formaldehyde	less than 10
Ethyl Benzene	less than 10
TOTAL	less than 25

Justification for Modification

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(e)(2), which states that modifications that would have a potential to emit: less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either particulate matter (PM) or particulate matter; less than ten (10) microns (PM10); less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of Volatile organic compounds (VOC); and less than twenty-five (25) tons per year of any regulated pollutant other than hazardous air pollutants, ten (10) tons per year of any single hazardous air pollutant as defined under Section 112(b) of the CAA, or twenty-five (25) tons per year of any combination of hazardous air pollutants.

County Attainment Status

The source is located in Ripley County.

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

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Ripley County has been designated as attainment or unclassifiable for ozone.

Source Status

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

Pollutant	Emissions (ton/yr)

PM	19.20
PM10	19.20
SO_2	0.00
VOC	1,683.20
CO	0.00
NO_x	0.00
Single HAP	332.50
Total HAP	893.80

(a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.

(b) These emissions were based on the Part 70 application submitted by the company.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Any Single HAP	Total HAPs
Inner panel spray booth, identified as IPB	0.54	0.54	0.00	5.69	0.00	0.00	1.92	2.47
Total Emissions	0.54	0.54	0.00	5.69	0.00	0.00	1.92	2.47

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

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

(b) The inner panel spray booth is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63), Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations because this facility is not considered a wood furniture manufacturing operation.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The existing source is a major PSD source. Therefore, any modification to this source which has the potential to emit of any of the criteria pollutants greater than the major modification thresholds, would be subject to the requirements of 326 IAC 2-2. The inner panel spray booth does not trigger PSD applicability. The PM, PM-10 and VOC emissions from this facility are equal to 0.54, 0.54 and 5.69 tons per year, respectively, after controls, which is less than PSD thresholds for PM, PM-10 and VOC.

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 100 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1 (Visible Emissions Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) 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 2-4.1-1 (New Source Toxics Control)

326 IAC 2-4.1-1 applies to new or reconstructed facilities with potential emissions of any single HAP equal or greater than ten (10) tons per twelve (12) month period and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per twelve (12) month period. Since the inner panel spray booth has the potential to emit any single HAP a combination of HAPs less than 10 tons and less than 25 tons per twelve (12) month period, respectively, the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the inner panel spray booth shall be limited by the following:

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

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

The dry filters shall be in operation at all times the inner panel spray booth is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Facilities existing as of January 1, 1980 having potential VOC emissions of 25 tons per year or more, and that are not subject to any other 8 rules, shall reduce VOC emissions using Best Available Control Technology (BACT). The inner panel spray booth has the potential to emit

VOC of less than 25 tons per twelve (12) month period. Therefore, the inner panel spray booth is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

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

The inner panel spray booth is not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operation). The application of coatings to burial caskets is not applicable to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operation).

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

The inner panel spray booth is not subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), because this booth does not coat wood furniture and/or wood components.

Compliance Requirements

Permits issued under 326 IAC 2-7are 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, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. 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 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.

There are no compliance monitoring requirements applicable to this facility.

Conclusion

The operation of this modification to a burial caskets and urns manufacturing plant shall be subject to the conditions of the attached proposed Minor Source Modification No. MSM 137-12307-00016.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: **Batesville Manufacturing, Inc. (Options Plant)**
Address City IN Zip: **705 East Pearl Street, Batesville, Indiana 47006**
CP: **MSM 137-12307-00016**
Reviewer: **Phillip Ritz/EVP**
Date: **May 23, 2000**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Benzene	Weight % Cumene	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Benzene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
H/S Gray Primer W27923C	11.61	0.02500	2.000	0.00%	0.00%	5.00%	0.00%	0.00%	1.00%	0.00	0.00	0.13	0.00	0.00	0.03
Aromatic 100 Solvent SC100	7.30	0.00807	2.000	0.00%	1.53%	0.00%	0.00%	0.00%	0.50%	0.00	0.01	0.00	0.00	0.00	0.00
Neapolitan Color Coat*	7.75	0.03240	2.000	0.00%	0.00%	15.00%	2.50%	0.00%	2.50%	0.00	0.00	0.33	0.05	0.00	0.05
Finch Color Coat W49681	7.85	0.03240	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Xylene	7.26	0.01214	2.000	0.10%	0.00%	90.00%	0.50%	0.00%	22.00%	0.00	0.00	0.69	0.00	0.00	0.17
Hi Build Clear W49671NC	8.93	0.04700	2.000	0.00%	0.00%	20.00%	0.00%	1.00%	5.00%	0.00	0.00	0.74	0.00	0.04	0.18
Aromatic 100 Solvent SC100	7.30	0.01880	2.000	0.00%	0.00%	3.00%	0.00%	0.00%	0.50%	0.00	0.00	0.04	0.00	0.00	0.01
Catalyst W45315	9.41	0.00070	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Diacetone Alcohol	7.82	0.00113	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions										**0.00**	**0.01**	**1.92**	**0.06**	**0.04**	**0.44**
															2.47

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
*The Finch Color Coat is the worst case coating for VOC, whereas the Neopolitan Color Coat-X is the worst case coating for HAPs.

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

Company Name: Batesville Manufacturing, Inc. (Options Plant)
Address City IN Zip: 705 East Pearl Street, Batesville, Indiana 47006
CP: MSM 137-12307-00016
Reviewer: Phillip Ritz/EVP
Date: May 23, 2000

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
H/S Gray Primer W27923C	11.61	25.22%	0.0%	25.2%	0.0%	0.00%	0.02500	2.000	2.93	2.93	0.15	3.51	0.64	0.95	ERR	50%
Aromatic 100 Solvent SC100	7.30	100.00%	0.0%	100.0%	0.0%	0.00%	0.00807	2.000	7.30	7.30	0.12	2.83	0.52	0.00	ERR	50%
Finch Color Coat W49681*	7.85	55.40%	0.0%	55.4%	0.0%	0.00%	0.03240	2.000	4.35	4.35	0.28	6.76	1.23	0.50	ERR	50%
Xylene	7.26	100.00%	0.0%	100.0%	0.0%	0.00%	0.01214	2.000	7.26	7.26	0.18	4.23	0.77	0.00	ERR	50%
Hi Build Clear W49671NC	8.93	33.62%	0.0%	33.6%	0.0%	0.00%	0.04700	2.000	3.00	3.00	0.28	6.77	1.24	1.22	ERR	50%
Aromatic 100 Solvent SC100	7.30	100.00%	0.0%	100.0%	0.0%	0.00%	0.01880	2.000	7.30	7.30	0.27	6.59	1.20	0.00	ERR	50%
Catalyst W45315	9.41	25.00%	0.0%	25.0%	0.0%	0.00%	0.00070	2.000	2.35	2.35	0.00	0.08	0.01	0.02	ERR	50%
Diacetone Alcohol	7.82	100.00%	0.0%	100.0%	0.0%	0.00%	0.00113	2.000	7.82	7.82	0.02	0.42	0.08	0.00	ERR	50%
State Potential Emissions			**Add worst case coating to all solvents**								**1.30**	**31.19**	**5.69**	**2.69**		

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
VOC	PM				
0.00%	80.00%	**1.30**	**31.19**	**5.69**	**0.54**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
*The Finch Color Coat is the worst case coating for VOC, whereas the Neopolitan Color Coat-X is the worst case coating for HAPs.