

April 12, 2001

Ms. Amy Dierdorff  
Valspar Industries (USA), Inc.  
546 W. Abbott Street  
Indianapolis, IN 46225

Re: 039-12993-00147  
First Minor Permit Modification to  
Part 70 Permit No.: 039-7428-00147

Dear Ms. Dierdorff:

Lilly Industries was issued a Part 70 operating permit on December 17, 1998 for a coating/paint manufacturing process. A letter requesting to add an emission unit was received on November 14, 2000. Also, in a letter dated February 26, 2001, IDEM was informed that Lilly Industries has changed its name to Valspar Industries (USA), Inc. Pursuant to the provisions of 2-7-12, a minor permit modification is hereby approved as classified in the attached Technical Support Document.

A putty mix tank, which has been classified as an exempt unit (039-12993-00147) under 326 IAC 2-1.1-3(d)(1), was added as an insignificant activity to the Title V permit. A new section, D.3, was also added for this emission unit. In addition, the source name was changed to Valspar Industries (USA), Inc. throughout the permit. Finally, an error on page 25 of the Title V permit was corrected. Spray booths SB1 and SB2 were incorrectly included twice in the D sections of the permit, in the facility description of both Section D.1 and D.2. The description was deleted from Section D.1.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment 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. Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Kate Huckelbridge, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Ms. Huckelbridge. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

*Original signed by Paul Dubenetzky*

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
ERG/KH

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Greg Wingstrom  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Valspar Industries (USA), Inc.**  
**28335 Clay Street**  
**Elkhart, Indiana 46517**

(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.

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 2-7 and 326 IAC 2-1-3.2 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.

Operation Permit No.: T039-7428-00147	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:

First Minor Permit Modification 039-12993	Pages Affected: 3, 25, 30a, 31-35
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality <i>Original signed by Paul Dubenetzky</i>	Issuance Date:  April 12, 2001

- (M) Ten (10) portable tanks, with a maximum capacity of 550 gallons each;
  - (N) Twelve (12) portable tanks, with a maximum capacity of 660 gallons each;
  - (O) One (1) soup tank;
  - (P) One (1) 5 horsepower lightning blender;
  - (Q) Three (3) Myers 4-stage hydraulic units (blenders);
  - (R) One (1) 15 horsepower Myers blender;
  - (S) One (1) 10 horsepower Myers blender;
  - (T) One (1) 125 horsepower two-speed disperser;
  - (U) Two (2) 30/60 horsepower two-speed dispersers with sweep arm;
  - (V) One (1) 100 horsepower two-speed disperser;
  - (W) One (1) 60 horsepower variable-speed disperser;
  - (X) One (1) 50 horsepower variable-speed disperser;
  - (Y) One (1) 35 horsepower variable-speed disperser;
  - (Z) One (1) 25 horsepower variable-speed disperser;
  - (AA) One (1) 30 horsepower variable-speed disperser;
  - (BB) One (1) 12-inch duct fan;
  - (CC) Two (2) dry filters; and
  - (DD) One (1) 3000 acfm fabric filter.
- (2) Two (2) spray paint booths used for testing the coatings for consistency and color sprayed onto glass plates, each utilizing one (1) air atomization spray gun, identified as SB1, which has a maximum capacity of 25 plates per hour and SB2, which has a maximum capacity of 7 plates per hour, using dry filters as control.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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

Facilities with emissions below significant thresholds: one (1) putty mix tank, with a maximum capacity of 500 gallons, using a baghouse DC-2 as control, and exhausting to stack DC-2.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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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).



## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) gelcoat mixing area, identified as CF1, with a maximum capacity of 1,600,000 gallons per year, using a baghouse as control, exhausting to one (1) stack (DC1), consisting of the following equipment:
- (A) Three (3) mix tanks, with a maximum capacity of 1,100 gallons each;
  - (B) One (1) mix tank, with a maximum capacity of 2,400 gallons;
  - (C) Four (4) mix tanks, with a maximum capacity of 1,100 gallons each;
  - (D) Two (2) mix tanks, with a maximum capacity of 1,200 gallons each;
  - (E) One (1) mix tank, with a maximum capacity of 1,000 gallons;
  - (F) One (1) mix tank, with a maximum capacity of 2,400 gallons;
  - (G) Ten (10) portable tanks, with a maximum capacity of 55 gallons each;
  - (H) Two (2) portable tanks, with a maximum capacity of 110 gallons each;
  - (I) Seven (7) portable tanks, with a maximum capacity of 165 gallons each;
  - (J) Three (3) portable tanks, with a maximum capacity of 220 gallons each;
  - (K) Ten (10) portable tanks, with a maximum capacity of 330 gallons each;
  - (L) Six (6) portable tanks, with a maximum capacity of 440 gallons each;
  - (M) Ten (10) portable tanks, with a maximum capacity of 550 gallons each;
  - (N) Twelve (12) portable tanks, with a maximum capacity of 660 gallons each;
  - (O) One (1) soup tank;
  - (P) One (1) 5 horsepower lightning blender;
  - (Q) Three (3) Myers 4-stage hydraulic units (blenders);
  - (R) One (1) 15 horsepower Myers blender;
  - (S) One (1) 10 horsepower Myers blender;
  - (T) One (1) 125 horsepower two-speed disperser;
  - (U) Two (2) 30/60 horsepower two-speed dispersers with sweep arm;
  - (V) One (1) 100 horsepower two-speed disperser;
  - (W) One (1) 60 horsepower variable-speed disperser;
  - (X) One (1) 50 horsepower variable-speed disperser;
  - (Y) One (1) 35 horsepower variable-speed disperser;
  - (Z) One (1) 25 horsepower variable-speed disperser;
  - (AA) One (1) 50 horsepower variable-speed disperser;
  - (BB) One (1) 12-inch duct fan;
  - (CC) Two (2) dry filters; and
  - (DD) One (1) 3000 acfm fabric filter.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the gelcoat mixing area shall be limited by the following:

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

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

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

#### Insignificant Activities:

One (1) putty mix tank, with a maximum capacity of 500 gallons, using a baghouse DC-2 as control, and exhausting to stack DC-2.

(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 2-7-5(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the putty mix tank shall not exceed 0.43 pounds per hour when operating at a process weight rate of 69 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

### Compliance Determination Requirements

#### D.3.2 Particulate Matter (PM)

In order to comply with D.3.1, the baghouse for PM control shall be in operation and control emissions from the putty mix tank at all times that the putty mix tank is in operation.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Valspar Industries (USA), Inc.  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7428-00147

**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:

- 9 Annual Compliance Certification Letter
- 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:

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

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Valspar Industries (USA), Inc.  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7428-00147

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<input checked="" type="radio"/>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:



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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: \_\_\_\_\_



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

**Part 70 Quarterly Report**

Source Name: Valspar Industries (USA), Inc.  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7428-00147  
Facility: one (1) gelcoat mixing area  
Parameter: volatile organic compound (VOC)  
Limit: 1,600,000 gallons produced by the gelcoat mixing area per year

YEAR: \_\_\_\_\_

Month	Total gallons produced this month	Total gallons produced in the last 12 months (including this month's production)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

### PART 70 OPERATING PERMIT QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Valspar Industries (USA), Inc.  
 Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
 Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
 Part 70 Permit No.: T039-7428-00147

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

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 Minor Permit Modification to a Part 70 Operating Permit**

#### **Source Background and Description**

Source Name:	Valspar Industries (USA), Inc.
Source Location:	28335 Clay Street, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	2851
Operation Permit No.:	039-7428-00147
Operation Permit Issuance Date:	December 17, 1998
Permit Modification No.:	039-12993-00147
Permit Reviewer:	ERG/KH

The Office of Air Quality (OAQ) has reviewed a modification application from Valspar Industries (USA), Inc. relating to the operation of a coating and paint manufacturing process.

#### **History**

On November 14, 2000, Lilly Industries submitted an application to the OAQ requesting to add additional surface coating lines to their existing plant. Lilly Industries was issued a Part 70 permit on December 14, 1998. After the modification was submitted to OAQ, the name Lilly Industries was changed to Valspar Industries (USA), Inc.

#### **Existing Approvals**

The source was issued a Part 70 Operating Permit T039-7428-00147 on December 17, 1998.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the Minor Permit 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 November 14, 2000. Additional information was received on January 3, 2001 and February 20, 2001.

#### **Emission Calculations**

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

**Potential To Emit of 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	0.11
PM-10	0.11
SO <sub>2</sub>	0
VOC	7.3
CO	0
NO <sub>x</sub>	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	7.3
TOTAL	7.3

**Potential to Emit of Modification After Issuance**

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Putty Mix Tank	0.11	0.11	0	7.3	0	0	7.3
Total Emissions	0.11	0.11	0	7.3	0	0	7.3

**Justification for the Modification**

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(b)(1) for modifications that meet the requirements of this section. This permit allows for the operation of a new putty mix tank which is being included in the Part 70 permit as an insignificant unit. This unit has been classified as an exempt unit under 326 IAC 2-1.1-3(d)(1).

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as nonattainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52-21.

#### 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) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

#### State Rule Applicability - Entire Source

##### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on November 14, 2000.

##### 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 6-3-2 (Process Operations)

The particulate matter (PM) from the putty mix tank 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:

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

P = process weight rate in tons per hour

The baghouse shall be in operation at all times the putty mix tank is in operation, in order to comply with this limit.

## Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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.

## Proposed Changes

- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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~~This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.~~

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

**Facilities with emissions below significant thresholds: one (1) putty mix tank, with a maximum capacity of 500 gallons, using a baghouse DC-2 as control, and exhausting to stack DC-2.**

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]**

- (1) One (1) gelcoat mixing area, identified as CF1, with a maximum capacity of 1,600,000 gallons per year, using a baghouse as control, exhausting to one (1) stack (DC1), consisting of the following equipment:
- (A) Three (3) mix tanks, with a maximum capacity of 1,100 gallons each;
  - (B) One (1) mix tank, with a maximum capacity of 2,400 gallons;
  - (C) Four (4) mix tanks, with a maximum capacity of 1,100 gallons each;
  - (D) Two (2) mix tanks, with a maximum capacity of 1,200 gallons each;
  - (E) One (1) mix tank, with a maximum capacity of 1,000 gallons;
  - (F) One (1) mix tank, with a maximum capacity of 2,400 gallons;
  - (G) Ten (10) portable tanks, with a maximum capacity of 55 gallons each;
  - (H) Two (2) portable tanks, with a maximum capacity of 110 gallons each;
  - (I) Seven (7) portable tanks, with a maximum capacity of 165 gallons each;
  - (J) Three (3) portable tanks, with a maximum capacity of 220 gallons each;
  - (K) Ten (10) portable tanks, with a maximum capacity of 330 gallons each;
  - (L) Six (6) portable tanks, with a maximum capacity of 440 gallons each;
  - (M) Ten (10) portable tanks, with a maximum capacity of 550 gallons each;
  - (N) Twelve (12) portable tanks, with a maximum capacity of 660 gallons each;
  - (O) One (1) soup tank;
  - (P) One (1) 5 horsepower lightning blender;
  - (Q) Three (3) Myers 4-stage hydraulic units (blenders);
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  - (S) One (1) 10 horsepower Myers blender;
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  - (U) Two (2) 30/60 horsepower two-speed dispersers with sweep arm;
  - (V) One (1) 100 horsepower two-speed disperser;
  - (W) One (1) 60 horsepower variable-speed disperser;
  - (X) One (1) 50 horsepower variable-speed disperser;
  - (Y) One (1) 35 horsepower variable-speed disperser;
  - (Z) One (1) 25 horsepower variable-speed disperser;
  - (AA) One (1) 50 horsepower variable-speed disperser;
  - (BB) One (1) 12-inch duct fan;
  - (CC) Two (2) dry filters; and
  - (DD) One (1) 3000 acfm fabric filter.
- (2) ~~Two (2) spray paint booths used for testing the coatings for consistency and color sprayed onto glass plates, each utilizing one (1) air atomization spray gun, identified as SB1, which has a maximum capacity of 25 plates per hour and SB2, which has a maximum capacity of 7 plates per hour, using dry filters as control.~~

**SECTION D.3**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

**Insignificant Activities:**

One (1) putty mix tank, with a maximum capacity of 500 gallons, using a baghouse DC-2 as control, and exhausting to stack DC-2.

(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 2-7-5(1)]**

**D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the putty mix tank shall not exceed 0.43 pounds per hour when operating at a process weight rate of 69 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

**Compliance Determination Requirements**

**D.3.2 Particulate Matter (PM)**

In order to comply with D.3.1, the baghouse for PM control shall be in operation and control emissions from the putty mix tank at all times that the putty mix tank is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: **Valspar Industries (USA), Inc.** ~~Lilly Industries, Incorporated~~  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7428-00147

<b>This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.</b>	
Please check what document is being certified:	
9	Annual Compliance Certification Letter
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:	

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

**P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: **Valspar Industries (USA), Inc.** ~~Lilly Industries, Inc.~~  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7428-00147

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9</b>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: \_\_\_\_\_

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

## Part 70 Quarterly Report

Source Name: **Valspar Industries (USA), Inc.** ~~Lilly Industries, Incorporated~~  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7428-00147  
Facility: one (1) gelcoat mixing area  
Parameter: volatile organic compound (VOC)  
Limit: 1,600,000 gallons produced by the gelcoat mixing area per year

YEAR: \_\_\_\_\_

Month	Total gallons produced this month	Total gallons produced in the last 12 months (including this month's production)

9No deviation occurred in this quarter.

9Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Indianapolis, Indiana 46225

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

## PART 70 OPERATING PERMIT QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: **Valspar Industries (USA), Inc.** ~~Lilly Industries, Inc.~~  
Source Address: 28335 Clay Street, Elkhart, Indiana 46517  
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517  
Part 70 Permit No.: T039-7428-00147

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Conclusion**

This permit modification shall be subject to the conditions of the attached Part 70 Minor Permit Modification No. 039-12993-00147.

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

**Company Name: Valspar Industries**  
**Address City IN Zip: 28335 Clay Street, Elkhart, IN 46517**  
**CP: 12993**  
**Plt ID: 00147**  
**Reviewer: ERG/KH**  
**Date: 01/04/2001**

VOC Emission Factor = 0.0022 lb VOC/lb putty produced  
Styrene Emission Factor = 0.0022 lb styrene/lb putty produced

Emission factors were provided by the source. Factors are based on emissions from production of a worst case VOC/HAP putty at a similar facility.

Maximum production capacity = 632,000 gal/yr  
density of putty = 10.5 lbs/gal

Maximum putty production = 6,636,000 lbs/yr

Maximum Potential to Emit VOC (tons/yr) = Maximum putty production (lbs/yr) \* Emission factor (lb VOC/lb putty) / 2000 lb/ton  
Maximum Potential to Emit VOC (tpy) = 6,636,000 lb/yr \* .0022 lb VOC/lb putty / 2000 lb/ton  
**Maximum Potential to Emit VOC (tpy) = 7.30**

Maximum Potential to Emit Styrene (tons/yr) = Maximum putty production (lbs/yr) \* Emission factor (lb styrene/lb putty) / 2000 lb/ton  
Maximum Potential to Emit Styrene (tpy) = 6,636,000 lb/yr \* .0022 lb styrene/lb putty / 2000 lb/ton  
**Maximum Potential to Emit Styrene (tpy) = 7.30**

**Appendix A: Emission Calculations**  
**PM Emission Calcs**

**Company Name: Valspar Industries**  
**Address City IN Zip: 28335 Clay Street, Elkhart, IN 46517**  
**CP#: 12993**  
**Plt ID: 00147**  
**Permit Reviewer: ERG/KH**  
**Date: 01/04/2001**

PM Emission Factor = 5.14 lb PM/ton dry material added

This emission factor was provided by the source. The factor was developed based on operating data from a similar source in North Carolina.

Maximum production capacity = 632,000 gal/yr  
Maximum volume per batch = 500 gal

Maximum batches per year = 1,264  
69 lbs of dry material is added per batch of putty

1264 batches/yr \* 69 lb/batch = 87216 lb dry material per year  
43.608 ton dry material per year

Maximum Potential to Emit PM (tons/yr) = Maximum dry material (ton/yr) \* Emission factor (lb PM/ton dry material) / 2000 lb/ton  
Maximum Potential to Emit PM (tpy) = 46.31 ton/yr \* 5.14 lb PM/ton dry material / 2000 lb/ton  
**Maximum Potential to Emit PM (tpy) = 0.11**