



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: November 16, 2005
RE: Syndicate Store Fixtures / 039-13697-00066
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 1/10/05



MITCHELL E. DANIELS, JR.

Governor

THOMAS W. EASTERLY

Commissioner

100 North Senate Avenue

Indianapolis, Indiana 46204-2251

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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Syndicate Systems, Inc.
402 North Main Street
Middlebury, Indiana 46540**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-13697-00066	
Issued by: Original signed by Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: November 16, 2005 Expiration Date: November 16, 2010

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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 and 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 permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary retail store fixtures manufacturing source.

Authorized Individual: Vice President
Source Address: 402 North Main Street, Middlebury, Indiana 46540-0070
Mailing Address: P.O. Box 70, Middlebury, Indiana 46540-0070
General Source Phone: (219) 825 - 9561
SIC Code: 3499
County Location: Elkhart
Source Location Status: Basic Nonattainment for 8-Hour Ozone
Attainment for all remaining criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired boiler, identified as 150 hp York Shipley Boiler Old Plating, installed in 1968, exhausting to Stack 85, rated at 6.27 million British thermal units per hour.
- (b) One (1) natural gas-fired boiler, identified as 300 hp York Shipley Boiler Old Plating, installed in 1978, exhausting to Stack 87, rated at 12.54 million British thermal units per hour.
- (c) One (1) natural gas-fired boiler, identified as 150 hp Kewanee Boiler New Product, installed circa 1960, exhausting to Stack 132, rated at 6.27 million British thermal units per hour.
- (d) Ninety-one (91) natural gas-fired space heaters, identified as Suspended Gas Heaters, exhausting to Stacks 27-1, 27-2, 30 through 37, 39 through 45, 51 through 53, 57 through 61, 63, 65, 123, 125 through 129, 150-2 through 150-6, 151-1, 151-2, 151-4 through 151-10, 153-2 through 153-9, 154-2 through 154-13, 155-2 through 155-17, 155-19 through 155-22, and 186-1 through 186-4, with a combined rating of 23.37 million British thermal units per hour.
- (e) Eight (8) natural gas-fired HVAC units, exhausting to Stacks 84, 114, 115, 175-1 through 175-4, and 175-6, with a combined rating of 2.0 million British thermal units per hour.
- (f) Ten (10) natural gas-fired air make-up units, exhausting to Stacks 92, 98, 119, 152, and 156-1 through 156-6, rated at 23.66 million British thermal units per hour, total.
- (g) Five (5) natural gas-fired recirculating gas heaters, exhausting to Stacks 187-1 through 187-5, with a combined rating of 13.38 million British thermal units per hour.

- (h) Production welding operations, consisting of the following:
 - (1) One hundred and five (105) electrical resistance welding stations, controlled by electrostatic precipitators, capacity: 520 pounds per hour, each.
 - (2) Thirty-one (31) MIG welding stations, using 0.30 millimeter diameter copper coated wire, equipped with electrostatic precipitators, exhausted to the plant interior, capacity: 0.22 pounds of wire per hour, each.
 - (3) Fifty-nine (59) MIG welding stations, using 0.35 millimeter diameter copper coated wire, equipped with electrostatic precipitators, exhausted to the plant interior, capacity: 0.4 pounds of wire per hour, each.
 - (4) Four (4) manual TIG welding stations, equipped with electrostatic precipitators, exhausted to the plant interior, capacity: 100 pounds per hour and 0.0684 pounds of metal melted per hour, each.
 - (5) Two (2) two-head automatic TIG welding stations, equipped with electrostatic precipitators, exhausted to the plant interior, capacity: 850 pounds per hour and 0.0684 pounds of metal melted per hour, each.
- (i) Buffing and grinding operations, consisting of five (5) pedestal buffing wheels, equipped with dust collectors and exhausting to the plant interior.
- (j) One (1) powder coat line, identified as Powder Coat #1, installed in 1989, with a capacity of 19,680 pounds of sheet steel and metal tubing per hour, consisting of the following:
 - (1) One (1) five-stage pretreatment line, controlled with a fume scrubber, exhausting to Stack 17, consisting of the following equipment:
 - (A) Stage 1 detergent spray washer, equipped with one (1) natural gas-fired burner, identified as PC1 Stage 1 Heater, exhausting to Stacks 11, 12 and 14, rated at 4.2 million British thermal units per hour.
 - (B) Stage 2 cold water rinse.
 - (C) Stage 3 phosphate conversion coating application, equipped with one (1) natural gas-fired burner, identified as PC1 Stage 3 Heater, exhausting to Stacks 7 and 8, rated at 3.2 million British thermal units per hour.
 - (D) Stage 4 cold water rinse.
 - (E) Stage 5 cold water rinse.
 - (2) One (1) dry off oven, equipped with two (2) natural gas-fired burners, exhausting to Stacks 3 and 10, rated at 2.75 million British thermal units per hour, each.
 - (3) One (1) powder application room, consisting of two (2) automatic powder booths, identified as #1 and #2, each controlled with cyclones, bag filters, and cartridge collectors with absolute filters, exhausted to the plant interior, capacity: 240 pounds of powder per hour, total.
 - (4) One (1) cure oven, equipped with one (1) natural gas-fired burner, exhausted to Stacks 18-1 and 18-2, rated at 3.85 million British thermal units per hour.

- (k) One (1) powder coat line, identified as Powder Coat #2, installed in 1993, with a capacity of 14,900 pounds of sheet steel and metal tubing per hour, consisting of the following:
 - (1) One (1) five-stage pretreatment line, controlled with a fume scrubber and exhausting to Stack 116, consisting of the following equipment:
 - (A) Stage 1 detergent spray washer, equipped with one (1) natural gas-fired burner, identified as PC2 Stage 1 Heater, exhausting to Stack 113, rated at 4.7 million British thermal units per hour.
 - (B) Stage 2 cold water rinse.
 - (C) Stage 3 phosphate conversion coating application, equipped with one (1) natural gas-fired burner, identified as PC2 Stage 3 Heater, exhausting to Stack 110, rated at 3.8 million British thermal units per hour.
 - (D) Stage 4 cold water rinse.
 - (E) Stage 5 cold water rinse.
 - (2) One (1) dry off oven, equipped with two (2) natural gas-fired burners, exhausting to Stacks 105 and 108, rated at 1.25 and 2.75 million British thermal units per hour, respectively.
 - (3) One (1) powder application room, consisting of two (2) automatic powder booths, identified as #1 and #2, and one (1) manual powder booth, all controlled with cyclones, bag filters, and cartridge collectors with absolute filters, exhausted to the plant interior, capacity: 240 pounds of powder per hour, total.
 - (4) One (1) cure oven, equipped with two (2) natural gas-fired burners, exhausting to Stacks 96 and 102, rated at 2.75 million British thermal units per hour, each.
- (l) One (1) powder coat line, identified as Powder Coat #3, installed in 1995, with a capacity of 26,100 pounds of sheet steel and metal tubing per hour, consisting of the following:
 - (1) One (1) five-stage pretreatment line, controlled with a fume scrubber and exhausting to Stacks 159-1 and 176-2, consisting of the following equipment:
 - (A) Stage 1 detergent spray washer, equipped with two (2) natural gas-fired burners, exhausting to Stacks 160-1 and 160-2, rated at 5.3 million British thermal units per hour, each.
 - (B) Stage 2 cold water rinse.
 - (C) Stage 3 phosphate conversion coating application, equipped with one (1) natural gas-fired burner, identified as PC3 Stage 4 Heater, exhausting to Stack 160-3, rated at 5.3 million British thermal units per hour.
 - (D) Stage 4 cold water rinse.
 - (E) Stage 5 cold water rinse.
 - (2) One (1) dry off oven, equipped with two (2) natural gas-fired burners, exhausting to Stack 164, rated at 4.5 million British thermal units per hour, each.

- (3) One (1) powder application room, consisting of two (2) automatic powder booths, identified as #1 and #2, and one (1) manual powder booth, identified as #2, each controlled with cyclones, bag filters, and cartridge collectors with absolute filters, exhausted to the plant interior, capacity: 320 pounds of powder per hour, total.
- (4) One (1) cure oven, equipped with four (4) natural gas-fired burners, exhausted to Stack 169, rated at 2.5 million British thermal units per hour, each.
- (m) One (1) caustic stripper line, consisting of the following equipment:
 - (1) One (1) caustic potassium hydroxide tank also containing two (2) glycol ethers, controlled with a gas scrubber and exhausting to Stack 22, maximum capacity: 0.5 gallons of solvent per hour and 11.9 gallons of solvent per day. (Source estimates 1.13 lbs glycol ether emitted per gallon)
 - (2) One (1) natural gas-fired tank heater, exhausted to Stack 38, rated at 0.75 million British thermal units per hour.
 - (3) One (1) natural gas-fired tank heater, exhausted to Stack 46, rated at 0.4 million British thermal units per hour.
- (n) Emergency equipment, consisting of:
 - (1) One (1) diesel-fired fire pump, exhausting to Stack 193, rated at 302 horsepower.
 - (2) One (1) emergency generator, firing natural gas, exhausted to Stack 194, rated at 170 horsepower.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate 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

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 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date

it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

(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 emissions unit:

- (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
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by an "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 PMP's 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 PMP 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 an "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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(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
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (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.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-20-3-1] [IC 13-17-3-2]

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 permitted 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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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.

B.11 Annual Fee Payment [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.

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing and Training Section), to determine the appropriate permit fee.

B.12 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 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.5 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
Indianapolis, Indiana 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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

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

- (a) Compliance testing on new emissions 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 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
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (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 the 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.7 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

C.8 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.

C.9 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.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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

emissions unit 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 not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) 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.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description: Natural gas-fired boilers, heating units, and welding operations

- (a) One (1) natural gas-fired boiler, identified as 150 hp York Shipley Boiler Old Plating, installed in 1968, exhausting to Stack 85, rated at 6.27 million British thermal units per hour.
- (b) One (1) natural gas-fired boiler, identified as 300 hp York Shipley Boiler Old Plating, installed in 1978, exhausting to Stack 87, rated at 12.54 million British thermal units per hour.
- (c) One (1) natural gas-fired boiler, identified as 150 hp Kewanee Boiler New Product, installed circa 1960, exhausting to Stack 132, rated at 6.27 million British thermal units per hour.
- (d) Ninety-one (91) natural gas-fired space heaters, identified as Suspended Gas Heaters, exhausting to Stacks 27-1, 27-2, 30 through 37, 39 through 45, 51 through 53, 57 through 61, 63, 65, 123, 125 through 129, 150-2 through 150-6, 151-1, 151-2, 151-4 through 151-10, 153-2 through 153-9, 154-2 through 154-13, 155-2 through 155-17, 155-19 through 155-22, and 186-1 through 186-4, with a combined rating of 23.37 million British thermal units per hour.
- (e) Eight (8) natural gas-fired HVAC units, exhausting to Stacks 84, 114, 115, 175-1 through 175-4, and 175-6, with a combined rating of 2.0 million British thermal units per hour.
- (f) Ten (10) natural gas-fired air make-up units, exhausting to Stacks 92, 98, 119, 152, and 156-1 through 156-6, rated at 23.66 million British thermal units per hour, total.
- (g) Five (5) natural gas-fired recirculating gas heaters, exhausting to Stacks 187-1 through 187-5, with a combined rating of 13.38 million British thermal units per hour.
- (h) Production welding operations, consisting of the following:
 - (1) One hundred and five (105) electrical resistance welding stations, controlled by electrostatic precipitators, throughput: 520 pounds per hour, each.
 - (2) Thirty-one (31) MIG welding stations, using 0.30 millimeter diameter copper coated wire, equipped with electrostatic precipitators, exhausted to the plant interior, capacity: 0.22 pounds of wire per hour, each.
 - (3) Fifty-nine (59) MIG welding stations, using 0.35 millimeter diameter copper coated wire, equipped with electrostatic precipitators, exhausted to the plant interior, capacity: 0.4 pounds of wire per hour, each.
 - (4) Four (4) manual TIG welding stations, equipped with electrostatic precipitators, exhausted to the plant interior, capacity: 100 pounds per hour and 0.0684 pounds of metal melted per hour, each.
 - (5) Two (2) two-head automatic TIG welding stations, equipped with electrostatic precipitators, exhausted to the plant interior, capacity: 850 pounds per hour and 0.0684 pounds of metal melted per hour, each.
- (i) Buffing and grinding operations, consisting of five (5) pedestal buffing wheels, equipped with dust collectors and exhausting to the plant interior.

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

Emission Limitations and Standards

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

- (a) Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1(b)), PM emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input. Therefore, the two (2) boilers, identified as 150 hp Kewanee Boiler New Product and 150 hp York Shipley Boiler Old Plating, shall be limited to 0.8 pounds of particulate matter per million British thermal units heat input.

- (b) Pursuant to 326 IAC 6-2-3(e) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1(b)), PM emissions from all facilities used for indirect heating purposes which has 250 million British thermal units per hour heat input or less, and which began operation after June 8, 1972, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input. Therefore, the one (1) boiler, identified as 300 hp York Shipley Boiler Old Plating, shall be limited to 0.6 pounds of particulate matter per million British thermal units heat input.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description: Powder paint lines, caustic stripper line, and emergency equipment

- (j) One (1) powder coat line, identified as Powder Coat #1, installed in 1989, with a capacity of 19,680 pounds of sheet steel and metal tubing per hour, consisting of the following:
 - (1) One (1) five-stage pretreatment line, controlled with a fume scrubber, exhausting to Stack 17, consisting of the following equipment:
 - (A) Stage 1 detergent spray washer, equipped with one (1) natural gas-fired burner, identified as PC1 Stage 1 Heater, exhausting to Stacks 11, 12 and 14, rated at 4.2 million British thermal units per hour.
 - (B) Stage 2 cold water rinse.
 - (C) Stage 3 phosphate conversion coating application, equipped with one (1) natural gas-fired burner, identified as PC1 Stage 3 Heater, exhausting to Stacks 7 and 8, rated at 3.2 million British thermal units per hour.
 - (D) Stage 4 cold water rinse.
 - (E) Stage 5 cold water rinse.
 - (2) One (1) dry off oven, equipped with two (2) natural gas-fired burners, exhausting to Stacks 3 and 10, rated at 2.75 million British thermal units per hour, each.
 - (3) One (1) powder application room, consisting of two (2) automatic powder booths, identified as #1 and #2, each controlled with cyclones, bag filters, and cartridge collectors with absolute filters, exhausted to the plant interior, capacity: 240 pounds of powder per hour, total.
 - (4) One (1) cure oven, equipped with one (1) natural gas-fired burner, exhausted to Stacks 18-1 and 18-2, rated at 3.85 million British thermal units per hour.
- (k) One (1) powder coat line, identified as Powder Coat #2, installed in 1993, with a capacity of 14,900 pounds of sheet steel and metal tubing per hour, consisting of the following:
 - (1) One (1) five-stage pretreatment line, controlled with a fume scrubber and exhausting to Stack 116, consisting of the following equipment:
 - (A) Stage 1 detergent spray washer, equipped with one (1) natural gas-fired burner, identified as PC2 Stage 1 Heater, exhausting to Stack 113, rated at 4.7 million British thermal units per hour.
 - (B) Stage 2 cold water rinse.
 - (C) Stage 3 phosphate conversion coating application, equipped with one (1) natural gas-fired burner, identified as PC2 Stage 3 Heater, exhausting to Stack 110, rated at 3.8 million British thermal units per hour.
 - (D) Stage 4 cold water rinse.
 - (E) Stage 5 cold water rinse.
 - (2) One (1) dry off oven, equipped with two (2) natural gas-fired burners, exhausting to Stacks 105 and 108, rated at 1.25 and 2.75 million British thermal units per hour, respectively.

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

Syndicate Systems, Inc.
Middlebury, Indiana
Permit Reviewer: EAL/MES

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Facility Description: Powder paint lines, caustic stripper line, and emergency equipment

- (3) One (1) powder application room, consisting of two (2) automatic powder booths, identified as #1 and #2, and one (1) manual powder booth, all controlled with cyclones, bag filters, and cartridge collectors with absolute filters, exhausted to the plant interior, capacity: 240 pounds of powder per hour, total.
- (4) One (1) cure oven, equipped with two (2) natural gas-fired burners, exhausting to Stacks 96 and 102, rated at 2.75 million British thermal units per hour, each.
- (l) One (1) powder coat line, identified as Powder Coat #3, installed in 1995, with a capacity of 26,100 pounds of sheet steel and metal tubing per hour, consisting of the following:
 - (1) One (1) five-stage pretreatment line, controlled with a fume scrubber and exhausting to Stacks 159-1 and 176-2, consisting of the following equipment:
 - (A) Stage 1 detergent spray washer, equipped with two (2) natural gas-fired burners, exhausting to Stacks 160-1 and 160-2, rated at 5.3 million British thermal units per hour, each.
 - (B) Stage 2 cold water rinse.
 - (C) Stage 3 phosphate conversion coating application, equipped with one (1) natural gas-fired burner, identified as PC3 Stage 4 Heater, exhausting to Stack 160-3, rated at 5.3 million British thermal units per hour.
 - (D) Stage 4 cold water rinse.
 - (E) Stage 5 cold water rinse.
 - (2) One (1) dry off oven, equipped with two (2) natural gas-fired burners, exhausting to Stack 164, rated at 4.5 million British thermal units per hour, each.
 - (3) One (1) powder application room, consisting of two (2) automatic powder booths, identified as #1 and #2, and one (1) manual powder booth, identified as #2, each controlled with cyclones, bag filters, and cartridge collectors with absolute filters, exhausted to the plant interior, capacity: 320 pounds of powder per hour, total.
 - (4) One (1) cure oven, equipped with four (4) natural gas-fired burners, exhausted to Stack 169, rated at 2.5 million British thermal units per hour, each.
- (m) One (1) caustic stripper line, consisting of the following equipment:
 - (1) One (1) caustic potassium hydroxide tank also containing two (2) glycol ethers, controlled with a gas scrubber and exhausting to Stack 22, maximum capacity: 0.5 gallons of solvent per hour and 11.9 gallons of solvent per day. (Source estimates 1.13 lbs glycol ether emitted per gallon)
 - (2) One (1) natural gas-fired tank heater, exhausted to Stack 38, rated at 0.75 million British thermal units per hour.
 - (3) One (1) natural gas-fired tank heater, exhausted to Stack 46, rated at 0.4 million British thermal units per hour.
- (n) Emergency equipment, consisting of:
 - (1) One (1) diesel-fired fire pump, exhausting to Stack 193, rated at 302 horsepower.
 - (2) One (1) emergency generator, firing natural gas, exhausted to Stack 194, rated at 170 horsepower.

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

Emission Limitations and Standards

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

- (a) Particulate from the powder application room at each of the three (3) powder coating lines 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.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three (3) powder coat lines any control devices.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of any inspections required by Condition D.2.1, and 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.

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. : _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: _____ / _____ / 20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE _____ / _____ / 20____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM₁₀, SO₂, VOC, OTHER:

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION:

MEASURES TAKEN TO MINIMIZE EMISSIONS:

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:
INTERIM CONTROL MEASURES: (IF APPLICABLE)

MALFUNCTION REPORTED BY: _____ TITLE:
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME:

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

* **Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Syndicate Systems, Inc.
Address:	402 North Main Street
City:	Middlebury, Indiana 46540
Phone #:	219 - 825 - 9561
MSOP #:	039-13697-00066

I hereby certify that Syndicate Systems, Inc. is still in operation.
 no longer in operation.

I hereby certify that Syndicate Systems, Inc. is in compliance with the requirements of MSOP 039-13697-00066.
 not in compliance with the requirements of MSOP 039-13697-00066.

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

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

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Syndicate Systems, Inc.
Source Location:	402 North Main Street, Middlebury, Indiana 46540-0070
County:	Elkhart
SIC Code:	3499
Operation Permit No.:	MSOP 039-13697-00066
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed an application from Syndicate Systems, Inc. relating to the operation of a retail store fixtures manufacturing source.

History

This source had been operating under IDEM, OAQ operating permits prior to the existence of the MSOP permit program. The source believed that their facility would be covered under the natural gas combustion Source Specific Operating Agreement (SSOA) rule 326 IAC 2-9-13(b)(2)(A), and stated this in a letter to OAQ received December 29, 2000. It has been determined that since this source also consists of operations that cannot be permitted by any type of SSOA, a Minor Source Operating Permit is the appropriate operating permit for this facility. Therefore, this MSOP is proposed.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) natural gas-fired boiler, identified as 150 hp York Shipley Boiler Old Plating, installed in 1968, exhausting to Stack 85, rated at 6.27 million British thermal units per hour.
- (b) One (1) natural gas-fired boiler, identified as 300 hp York Shipley Boiler Old Plating, installed in 1978, exhausting to Stack 87, rated at 12.54 million British thermal units per hour.
- (c) One (1) natural gas-fired boiler, identified as 150 hp Kewanee Boiler New Product, installed circa 1960, exhausting to Stack 132, rated at 6.27 million British thermal units per hour.
- (d) Ninety-one (91) natural gas-fired space heaters, identified as Suspended Gas Heaters, exhausting to Stacks 27-1, 27-2, 30 through 37, 39 through 45, 51 through 53, 57 through 61, 63, 65, 123, 125 through 129, 150-2 through 150-6, 151-1, 151-2, 151-4 through 151-10, 153-2 through 153-9, 154-2 through 154-13, 155-2 through 155-17, 155-19 through 155-22, and 186-1 through 186-4, with a combined rating of 23.37 million British thermal units per hour.
- (e) Eight (8) natural gas-fired HVAC units, exhausting to Stacks 84, 114, 115, 175-1 through 175-4, and 175-6, with a combined rating of 2.0 million British thermal units per hour.
- (f) Ten (10) natural gas-fired air make-up units, exhausting to Stacks 92, 98, 119, 152, and 156-

1 through 156-6, rated at 23.66 million British thermal units per hour, total.

- (g) Five (5) natural gas-fired recirculating gas heaters, exhausting to Stacks 187-1 through 187-5, with a combined rating of 13.38 million British thermal units per hour.
- (h) Production welding operations, consisting of the following:
 - (1) One hundred and five (105) electrical resistance welding stations, controlled by electrostatic precipitators which are exhausted to the plant interior, capacity: 520 pounds per hour, each.
 - (2) Thirty-one (31) MIG welding stations, using 0.30 millimeter diameter copper coated wire, equipped with electrostatic precipitators which are exhausted to the plant interior, capacity: 0.22 pounds of wire per hour, each.
 - (3) Fifty-nine (59) MIG welding stations, using 0.35 millimeter diameter copper coated wire, equipped with electrostatic precipitators which are exhausted to the plant interior, capacity: 0.4 pounds of wire per hour, each.
 - (4) Four (4) manual TIG welding stations, equipped with electrostatic precipitators which are exhausted to the plant interior, capacity: 100 pounds per hour and 0.0684 pounds of metal melted per hour, each.
 - (5) Two (2) two-head automatic TIG welding stations, equipped with electrostatic precipitators which are exhausted to the plant interior, capacity: 850 pounds per hour and 0.0684 pounds of metal melted per hour, each.
- (i) Buffing and grinding operations, consisting of five (5) pedestal buffing wheels, equipped with dust collectors and exhausting to the plant interior.
- (j) One (1) powder coat line, identified as Powder Coat #1, installed in 1989, with a capacity of 19,680 pounds of sheet steel and metal tubing per hour, consisting of the following:
 - (1) One (1) five-stage pretreatment line, controlled with a fume scrubber, exhausting to Stack 17, consisting of the following equipment:
 - (A) Stage 1 detergent spray washer, equipped with one (1) natural gas-fired burner, identified as PC1 Stage 1 Heater, exhausting to Stacks 11, 12 and 14, rated at 4.2 million British thermal units per hour.
 - (B) Stage 2 cold water rinse.
 - (C) Stage 3 phosphate conversion coating application, equipped with one (1) natural gas-fired burner, identified as PC1 Stage 3 Heater, exhausting to Stacks 7 and 8, rated at 3.2 million British thermal units per hour.
 - (D) Stage 4 cold water rinse.
 - (E) Stage 5 cold water rinse.
 - (2) One (1) dry off oven, equipped with two (2) natural gas-fired burners, exhausting to Stacks 3 and 10, rated at 2.75 million British thermal units per hour, each.
 - (3) One (1) powder application room, consisting of two (2) automatic powder booths, identified as #1 and #2, each controlled with cyclones, bag filters, and cartridge

collectors with absolute filters, exhausted to the plant interior, capacity: 240 pounds of powder per hour, total.

- (4) One (1) cure oven, equipped with one (1) natural gas-fired burner, exhausted to Stacks 18-1 and 18-2, rated at 3.85 million British thermal units per hour.
- (k) One (1) powder coat line, identified as Powder Coat #2, installed in 1993, with a capacity of 14,900 pounds of sheet steel and metal tubing per hour, consisting of the following:
 - (1) One (1) five-stage pretreatment line, controlled with a fume scrubber and exhausting to Stack 116, consisting of the following equipment:
 - (A) Stage 1 detergent spray washer, equipped with one (1) natural gas-fired burner, identified as PC2 Stage 1 Heater, exhausting to Stack 113, rated at 4.7 million British thermal units per hour.
 - (B) Stage 2 cold water rinse.
 - (C) Stage 3 phosphate conversion coating application, equipped with one (1) natural gas-fired burner, identified as PC2 Stage 3 Heater, exhausting to Stack 110, rated at 3.8 million British thermal units per hour.
 - (D) Stage 4 cold water rinse.
 - (E) Stage 5 cold water rinse.
 - (2) One (1) dry off oven, equipped with two (2) natural gas-fired burners, exhausting to Stacks 105 and 108, rated at 1.25 and 2.75 million British thermal units per hour, respectively.
 - (3) One (1) powder application room, consisting of two (2) automatic powder booths, identified as #1 and #2, and one (1) manual powder booth, all controlled with cyclones, bag filters, and cartridge collectors with absolute filters, exhausted to the plant interior, capacity: 240 pounds of powder per hour, total.
 - (4) One (1) cure oven, equipped with two (2) natural gas-fired burners, exhausting to Stacks 96 and 102, rated at 2.75 million British thermal units per hour, each.
- (l) One (1) powder coat line, identified as Powder Coat #3, installed in 1995, with a capacity of 26,100 pounds of sheet steel and metal tubing per hour, consisting of the following:
 - (1) One (1) five-stage pretreatment line, controlled with a fume scrubber and exhausting to Stacks 159-1 and 176-2, consisting of the following equipment:
 - (A) Stage 1 detergent spray washer, equipped with two (2) natural gas-fired burners, exhausting to Stacks 160-1 and 160-2, rated at 5.3 million British thermal units per hour, each.
 - (B) Stage 2 cold water rinse.
 - (C) Stage 3 phosphate conversion coating application, equipped with one (1) natural gas-fired burner, identified as PC3 Stage 4 Heater, exhausting to Stack 160-3, rated at 5.3 million British thermal units per hour.
 - (D) Stage 4 cold water rinse.

- (E) Stage 5 cold water rinse.
- (2) One (1) dry off oven, equipped with two (2) natural gas-fired burners, exhausting to Stack 164, rated at 4.5 million British thermal units per hour, each.
- (3) One (1) powder application room, consisting of two (2) automatic powder booths, identified as #1 and #2, and one (1) manual powder booth, identified as #2, each controlled with cyclones, bag filters, and cartridge collectors with absolute filters, exhausted to the plant interior, capacity: 320 pounds of powder per hour, total.
- (4) One (1) cure oven, equipped with four (4) natural gas-fired burners, exhausted to Stack 169, rated at 2.5 million British thermal units per hour, each.
- (m) One (1) caustic stripper line, consisting of the following equipment:
 - (1) One (1) caustic potassium hydroxide tank also containing two (2) glycol ethers, controlled with a gas scrubber and exhausting to Stack 22, maximum capacity: 0.5 gallons of solvent per hour and 11.9 gallons of solvent per day. (Source estimates 1.13 pounds glycol ether emitted per gallon)
 - (2) One (1) natural gas-fired tank heater, exhausted to Stack 38, rated at 0.75 million British thermal units per hour.
 - (3) One (1) natural gas-fired tank heater, exhausted to Stack 46, rated at 0.4 million British thermal units per hour.
- (n) Emergency equipment, consisting of:
 - (1) One (1) diesel-fired fire pump, exhausting to Stack 193, rated at 302 horsepower.
 - (2) One (1) emergency generator, firing natural gas, exhausted to Stack 194, rated at 170 horsepower.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

There are no new facilities proposed at this source during this review process.

Existing Approvals

The source has constructed and has been operating under the following previous approvals including:

- (a) OP 20-05-86-0610, unknown issuance date, amended July 15, 1985 and April 24, 1986; and
- (b) Registered Construction and Operation Status 039-4451-00066, issued on May 8, 1995.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

The following terms and conditions from previous approvals have been determined to be no longer

applicable, and, therefore, are not incorporated into this permit:

- (a) OP 20-05-86-0610, as revised on July 15, 1985

Condition 6, which limited the quantity of paint usage to less than 40,244 gallons per year as applied, or 36,464 as purchased, in order to limit potential VOC emissions to less than 95 tons per year.

Reason not incorporated: The company now uses powder coat paints which do not contain VOC. Therefore, this limitation is unnecessary.

- (b) All construction conditions from all previous permits.

Reason not incorporated: All facilities previously permitted have already been constructed. Therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the cyclones, bag filters, and cartridge collectors with absolute filters be considered as an integral part of the three (3) powder coat lines (Powder Coat #1, Powder Coat #2 and Powder Coat #3):

The powder coating systems have a high transfer efficiency, however, Syndicate Systems, Inc. cannot afford to lose powder that does not get applied to the part. The control equipment captures the overspray powder paint and returns it to a collection module so that it can be re-directed back to the applicators.

Recaptured powder has a monetary value of approximately \$2.00 per pound. Therefore, capture and re-use of powder at the three (3) lines (with a maximum capacity of 149 pounds per hour of overspray) would be worth \$1,788,000 over a year's time period.

There are a total of thirteen (13) collectors at the three (3) powder coat lines. Each were installed between 1992 and 1994 at a cost of approximately \$15,000 each, for a total of \$195,000. Filter replacement for each collector costs \$1,500 every other year, for a total of \$9,750 per year.

Thus, the initial cost of the equipment would be recovered after only $(\$195,000 / \$1,788,000 \text{ per year} \times 8,760 \text{ hours per year})$ 955 hours of operation, and the source would potentially save $(\$1,788,000 - \$9,750)$ \$1,778,250 per year by operating the control devices. This overwhelming net positive economic effect would indicate that the source would use the control equipment even if no air pollution regulations were in place.

IDEM, OAQ has evaluated the justifications and agreed that the air pollution control equipment will be considered as an integral part of the powder coating processes. Therefore, the permitting level will be determined using the potential to emit after the air pollution control equipment. Operating conditions in the proposed permit will specify that this air pollution control equipment shall operate at all times when the powder coating processes are in operation.

Stack Summary

The following is a summary of the significant process stacks:

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
85	150 hp Boiler	29.0	1.0	1,500	350
87	300 hp Boiler	29.0	1.5	2,950	350
132	150 hp Boiler	28.0	2.5	1,000	253
22	Caustic Stripper	32.0	1.5	6,226	ambient

The source also includes many stacks for the natural gas-fired combustion units.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation 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 December 29, 2000, with additional information received on May 21, 2001 and September 29, 2005.

Emission Calculations

See Pages 1 through 5 of Appendix A of this document for detailed emissions calculations.

Potential glycol ether emissions calculation for the one (1) caustic potassium hydroxide tank is as follows:

$$0.5 \text{ gallons solvent/hr} \times (1.13 \text{ lbs glycol ether emitted/gallon solvent}) \times (1 \text{ ton}/2,000 \text{ lbs}) \times (8,760 \text{ hrs/year}) = 2.47 \text{ tons/year}$$

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/year)
PM	11.8
PM ₁₀	15.8
SO ₂	0.571

VOC	4.00
CO	58.8
NO _x	71.7

HAPs	Potential To Emit (tons/year)
Benzene	0.001
Dichlorobenzene	0.0008
Formaldehyde	0.052
Hexane	1.25
Toluene	0.002
Lead Compounds	0.0003
Cadmium Compounds	0.0008
Chromium Compounds	0.003
Manganese Compounds	0.005
Nickel Compounds	0.001
Glycol Ethers	2.47
TOTAL	3.79

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of NO_x and CO are equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM ₁₀	0.0
SO ₂	0.0
VOC	1.0
CO	7.0
NO _x	9.0
HAP	not reported

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	maintenance attainment
8-Hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. **Elkhart** County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) **Elkhart** County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for **PM_{2.5}** emissions. See the State Rule Applicability for the source section.
- (c) **Elkhart** County has been classified as attainment or unclassifiable in Indiana for all 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 - Entire Source section of this document.
- (d) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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.

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Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source based on the emissions summarized in this permit, MSOP 039-13697-00066, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than one hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) any combination of HAPs is less than twenty-five (25) tons per year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.110 and 110a, Subparts K and Ka), are not included in the permit for this source. The one (1) tank in the caustic stripper line is not a storage vessel for petroleum liquids.
- (c) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.110b, Subpart Kb), are not included in the permit for this source. The one (1) tank in the caustic stripper line is considered a process tank and not a storage vessel.
- (d) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) are not included in this permit for the two (2) natural gas-fired boilers, identified as 150 hp York Shipley Boiler Old Plating and 150 hp Kewanee Boiler New Product, each rated at 6.27 million British thermal units per hour, because each boiler has a heat input capacity less than ten (10) million British thermal units per hour.

The the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) are not included in this permit for the one (1) natural gas-fired boiler, identified as 300 hp York Shipley Boiler Old Plating, rated at 12.54 million British thermal units per hour and installed in 1978, because the boiler was constructed prior to the applicability date of June 9, 1989.

- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) included in this permit.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD are not included in this permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM are not included in this permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2.

State Rule Applicability - Entire Source

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

This type of operation is not one of the 28 listed source categories under 326 IAC 2-2, and the potential to emit of each pollutant is less than two hundred fifty (250) tons per year. Therefore, this source is not subject to the requirements of 326 IAC 2-2, and is a minor source with respect to this rule.

326 IAC 2-4.1 (New source toxics control)

This source is not subject to the requirements of 326 IAC 2-4.1, because the source does not have the potential to emit ten (10) tons per year or greater of a single HAP or twenty-five (25) tons per year or greater of a combination of HAPs, and it was constructed prior to the applicability date of July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program). Therefore, the requirements of 326 IAC 2-6 do not apply.

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 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 6-2-3 (Particulate Emissions Limitations for Facilities Constructed prior to September 21, 1983)

Pursuant to 326 IAC 6-2-3, particulate emissions from the three (3) boilers, identified as 150 hp Kewanee Boiler New Product, installed circa 1960, rated at 6.27 million British thermal units per hour, 150 hp York Shipley Boiler Old Plating, installed in 1968, rated at 6.27 million British thermal units per hour, and 300 hp York Shipley Boiler Old Plating, installed in 1978, rated at 12.54 million British thermal units per hour, shall be limited by the following equation:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}} \quad Pt = \text{lbs of particulate emitted per MMBtu heat input}$$

C = maximum ground level concentration (default = 50 u/m³)
a = plume rise factor (default = 0.67 for Q less than 1,000 MMBtu/hr)
h = stack height in feet
Q = total source maximum operating capacity
N = number of stacks in fuel burning operation

- (a) For the two (2) boilers, constructed prior to June 8, 1972:

$$Pt = \frac{50 * 0.67 * 28.5}{76.5 * 12.54^{0.75} * 2^{0.25}}$$

$$Pt = 1.57 \text{ lbs of particulate emitted per MMBtu heat input}$$

Pursuant to 326 IAC 6-2-3(d), particulate emissions from all facilities in operation prior to June 8, 1972 shall in no case exceed 0.8 lb per MMBtu heat input. Therefore,

$$Pt = 0.8 \text{ lbs of particulate emitted per MMBtu heat input}$$

Based on Appendix A, the worst-case potential particulate emission rate is:

$$0.104 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.024 \text{ lb/hr}$$
$$(0.024 \text{ lb/hr} / 12.54 \text{ mmBtu/hr}) = 0.002 \text{ lb particulate per mmBtu}$$

The particulate emissions from the two (2) boilers are 0.002 pounds per million British thermal units, which is less than the allowable emission rate of 0.8 pounds per million British thermal units. Therefore, the two (2) boilers, identified as 150 hp Kewanee Boiler New

Product and 150 hp York Shipley Boiler Old Plating, are in compliance with this rule.

- (b) For the one (1) boiler, constructed after June 8, 1972:

$$Pt = \frac{50 * 0.67 * 28.75}{76.5 * 25.08^{0.75} * 3^{0.25}}$$

Pt = 0.85 lbs of particulate emitted per MMBtu heat input

Pursuant to 326 IAC 6-2-3(e), particulate emissions from all facilities which began operation after June 8, 1972 and have heat input capacity less than 250 million British thermal units per hour shall in no case exceed 0.6 lb per MMBtu heat input. Therefore,

Pt = 0.6 lbs of particulate emitted per MMBtu heat input

Based on Appendix A, the worst-case potential particulate emission rate is:

$$0.104 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.024 \text{ lb/hr}$$
$$(0.024 \text{ lb/hr} / 12.54 \text{ mmBtu/hr}) = 0.002 \text{ lb particulate per mmBtu}$$

The particulate emissions from the one (1) boiler are 0.002 pounds per million British thermal units, which is less than the allowable emission rate of 0.6 pounds per million British thermal units. Therefore, the one (1) boiler, identified as 300 hp York Shipley Boiler Old Plating, is in compliance with this rule.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) powder coat lines, identified as Powder Coat #1, Powder Coat #2 and Powder Coat #3, 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.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (b) Pursuant to 326 IAC 6-3-1, the welding processes at this source are exempt from the requirements of 326 IAC 6-3 because they consume less than 625 pounds of rod or wire per day.
- (c) The buffing and grinding operations are exempt from the requirements of 326 IAC 6-3 because they emit negligible amounts of particulate. Pursuant to 326 IAC 6-3-1(b)(14), operations with potential particulate emissions less than 0.551 pounds per hour are exempt from the requirements of 326 IAC 6-3.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

The requirements of 326 IAC 7-1.1 are not applicable to the one (1) diesel-fired fire pump, rated at 302 horsepower, because the potential emissions of SO₂ from the fire pump are less than ten (10) pounds per hour and twenty-five (25) tons per year.

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

The three (3) powder coat lines, identified as Powder Coat #1, Powder Coat #2 and Powder Coat #3, are not subject to the requirements of 326 IAC 8-2-9, because the powder paints do not contain volatile organic compounds (VOC).

Conclusion

The operation of this retail store fixtures manufacturing source shall be subject to the conditions of the attached proposed Minor Source Operating Permit **MSOP 039-13697-00066**.

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

**Company Name: Syndicate Systems, Inc.
Address City IN Zip: 402 North Main Street, Middlebury, Indiana 46540-0070
MSOP: 039-13697
Plt ID: 039-00066
Reviewer: Edward A. Longenberger
Date: December 29, 2000**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
158.290	1386.62

	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	1.317	5.269	0.416	69.33	3.813	58.24

*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 (SUPPLEMENT D 3/98)

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

See page 2 for HAPs emissions calculations.

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

Company Name: Syndicate Systems, Inc.
Address City IN Zip: 402 North Main Street, Middlebury, Indiana 46540-0070
MSOP: 039-13697
Plt ID: 039-00066
Reviewer: Edward A. Longenberger
Date: December 29, 2000

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	1.456E-03	8.320E-04	5.200E-02	1.248E+00	2.357E-03

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
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	3.467E-04	7.626E-04	9.706E-04	2.635E-04	1.456E-03	1.308

Methodology is the same as page 1.

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

Appendix A: Welding and Thermal Cutting

Company Name: Syndicate Systems, Inc.
 Address City IN Zip: 402 North Main Street, Middlebury, Indiana 46540-0070
 MSOP: 039-13697
 Pit ID: 039-00066
 Reviewer: Edward A. Longenberger
 Date: December 29, 2000

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	0	0		0.036				0.000	0	0.000	0	0.000
Metal Inert Gas (MIG)(ER5154)	90	0.4		0.0241	0.000034		0.00001	0.868	0.001224	0.000	0.00036	0.002
Stick (E7018 electrode)	0	0		0.0211				0.000	0	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	6	0		0.0055				0.000	0	0.000	0	0.000
Oxyacetylene(carbon steel)	0	0		0.0055				0.000	0	0.000	0	0.000
FLAME CUTTING												
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)				EMISSIONS (lbs/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma	0	0	0					0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.868	0.001	0.000	0.000	0.002
Potential Emissions lbs/day								20.82	0.029	0.000	0.009	0.038
Potential Emissions tons/year								3.80	0.005	0.000	0.002	0.007

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
 Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).
 Welding and other flame cutting emission factors are from an internal training session document.
 See AP-42, Chapter 12.19 for additional emission factors for welding.

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

**Company Name: Syndicate Systems, Inc.
Address City IN Zip: 402 North Main Street, Middlebury, Indiana 46540-0070
MSOP: 039-13697
Plt ID: 039-00066
Reviewer: Edward A. Longenberger
Date: December 29, 2000**

Unit ID	Powder Paint Usage Rate (lbs/hour)	Transfer Efficiency (%)	Uncontrolled Potential Emissions (lbs/hour)	Uncontrolled Potential Emissions (tons/year)	Control Efficiency (%)	Potential to Emit (lbs/hour)	Potential to Emit (tons/year)
Powder Coat #1	240	80.0%	48.00	210.24	99.0%	0.480	2.10
Powder Coat #2	185	80.0%	37.00	162.06	99.0%	0.370	1.62
Powder Coat #3	320	80.0%	64.00	280.32	99.0%	0.640	2.80
State Potential Emissions*						1.49	6.53

METHODOLOGY

Uncontrolled potential emissions (lbs/hr) = Powder paint usage (lbs/hr) * (1-Transfer efficiency)

Uncontrolled potential emissions (tons/yr) = Powder paint usage (lbs/hr) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to emit (lbs/hr) = Powder paint usage (lbs/hr) * (1-Transfer efficiency) * (1-Control efficiency)

Uncontrolled potential emissions (tons/yr) = Powder paint usage (lbs/hr) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs) * (1-Control efficiency)

* The potential to emit for the powder coating operations are the potential emissions after control, since the control equipment has been determined to be an integral part of the process.

**Appendix A: Emission Calculations
Emergency Equipment**

**Company Name: Syndicate Systems, Inc.
Address City IN Zip: 402 North Main Street, Middlebury, Indiana 46540-0070
MSOP: 039-13697
Plt ID: 039-00066
Reviewer: Edward A. Longenberger
Date: December 29, 2000**

Emergency fire pump: Based on 500 hours of operation per year

Mechanical Output Potential Throughput
Horsepower (hp) hp-hr/yr

302.0 151000.0

Emission Factor in lb/hp-hr	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	0.166	0.166	0.155	2.34	0.190	0.504

Methodology

Potential Throughput (hp-hr/yr) = hp * 500 hr/yr for emergency equipment

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

Emergency generator: Based on 500 hours of operation per year

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

0.433 0.216

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0002	0.0008	0.0001	0.011	0.001	0.009

*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 500 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 (SUPPLEMENT D 3/98)

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