FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL

All State Manufacturing Co., Inc.
4024 2nd Parkway
Terre Haute, Indiana 47805

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F167-13892-00101	
Issued by: ORIGINAL SIGNED BY: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: September 16, 2005 Expiration Date: September 16, 2010

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Vigo County Air Pollution Control (VCAPC). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a vending machine rebuilding company.

Authorized individual:	President
Source Address:	4024 2nd Parkway, Terre Haute, Indiana 47805
Mailing Address:	4024 2nd Parkway, Terre Haute, Indiana 47805
General Source Phone:	(812) 238-5033
SIC Code:	3333
Source Location Status:	Vigo County Nonattainment for ozone under the 8-hour standard, Maintenance Attainment for Sulfur Dioxide (SO_2) Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) paint booth (air atomization), identified as A, installed in 1989, with a maximum capacity of 7.5 gallons per hour, and a maximum throughput capacity of 10 vending machine cabinets per hour, using dry filters as particulate control, and exhausting to stack SC-1.

(b) One (1) paint booth (air atomization), identified as B, installed in 1993, with a maximum coating usage of 7.5 gallons per hour, and a maximum throughput capacity of 10 vending machine cabinets per hour, using dry filters as particulate control, and exhausting to stack SC-2.

(c) One (1) spray coating (air atomization) area used for primer application, identified as C, installed in 1975, with a maximum coating usage of 1.57 gallons per hour, using dry filters as particulate control, and exhausting to stack INT-1.

(d) One (1) spray coating (air atomization) area used for touch-up aerosols, identified as D, installed in 1975, with a maximum coating usage of 4.6 gallons per hour, using no control, and exhausting to stack T1.

(e) Abrasive blast cabinet, identified as Unit P, installed prior to 1985, with a maximum throughput of 150 pounds per hour or 30 cabinets per hour, using a dust collector as particulate control, and exhausting to stack INT-10.

(f) Body shop sanding, identified as Unit G, installed in 1994, with a maximum throughput of 150 pounds or 30 cabinets per hour, using a dust collector as particulate control, and exhausting to stack INT-4.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:

(1) Natural gas-fired heater, identified as Unit H, installed in 1993, with a maximum heat input capacity of 1.9 MMBtu/hr, using no control, and exhausting to stack INT-5.

(2) Natural gas-fired heater, identified as Unit J, installed in 1993, with a maximum heat input capacity of 1.6 MMBtu/hr, using no control, and exhausting to stack INT-6.

(3) Natural gas-fired heater, identified as Unit K, installed in 1993, with a maximum heat input capacity of 0.6 MMBtu/hr, using no control, and exhausting to stack INT-7.

(4) Natural gas-fired hot water wash tank #1, identified as Unit L, installed in 1975, with a maximum heat input capacity of 0.05 MMBtu/hr, using no control, and exhausting to stack INT-8.

(5) Natural gas-fired hot water wash tank #2, identified as Unit M, installed in 1975, with a maximum heat input capacity of 0.05 MMBtu/hr, using no control, and exhausting to stack INT-9.

(6) Natural gas-fired pressure washer, identified as Unit N, installed in 1995, with a maximum heat input capacity of 0.4 MMBtu/hr, using no control, and exhausting to stack SU-1.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:

(1) Paint gun clean-up area, identified as Unit E, installed in 1975, with a maximum cleaner usage of 2 gallons per year, using no control, and exhausting to stack INT-3.

A.4 FESOP Applicability [326 IAC 2-8-2]

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

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

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by VCAPC.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, and VCAPC within a reasonable time, any information that IDEM, OAQ, and VCAPC may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and VCAPC copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, and VCAPC, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and VCAPC on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and VCAPC may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, and VCAPC upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and VCAPC. IDEM, OAQ, and VCAPC may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

IDEM, OAQ
Telephone No.: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for IDEM, OAQ, Compliance Section)
Facsimile No.: 317-233-5967

and

VCAPC
Telephone No.: 812-462-3433
Facsimile No.: 812-462-3447

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, and VCAPC, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, and VCAPC, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The

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

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

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by VCAPC to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by VCAPC at least thirty (30) days in advance of the date this permit is to be reopened, except that VCAPC may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(2) If IDEM, OAQ, and VCAPC upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, and VCAPC takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and VCAPC, any additional information identified as needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

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

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, VCAPC or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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

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

C.1 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 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.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

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

(b) The Permittee shall notify IDEM, OAQ, and VCAPC of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

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

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

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of any parameter, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ, and VCAPC approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, and VCAPC upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ, and VCAPC of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and VCAPC within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ, and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and VCAPC may extend the retesting deadline.

(c) IDEM, OAQ, and VCAPC reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the VCAPC Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the VCAPC Administrator within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46206

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, IN 47807

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and VCAPC on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) paint booth, identified as A, installed in 1989, with a maximum capacity of 7.5 gallons per hour, and a maximum throughput capacity of 10 vending machine cabinets per hour, using dry filters as particulate control, and exhausting to stack SC-1.

(b) One (1) paint booth, identified as B, installed in 1993, with a maximum coating usage of 7.5 gallons per hour, and a maximum throughput capacity of 10 vending machine cabinets per hour, using dry filters as particulate control, and exhausting to stack SC-2.

(c) One (1) spray coating area used for primer application, identified as C, installed in 1975, with a maximum coating usage of 1.57 gallons per hour, using dry filters as particulate control, and exhausting to stack INT-1.

(d) One (1) spray coating area used for touch-up aerosols, identified as D, installed in 1975, with a maximum coating usage of 4.6 gallons per hour, using no control, and exhausting to stack T1.

Insignificant Activity:

(b) Paint gun clean-up area, identified as Unit E, installed in 1975, with a maximum cleaner usage of 2 gallons per year, using no control, and exhausting to stack INT-3.

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

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

D.1.1 Particulate Emission Limitations [326 IAC 6-1-2] [326 IAC 2-8]

Pursuant to 326 IAC 6-1-2, the allowable particulate matter emissions rate from Units A, B, and C shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf) and shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

(a) The source shall operate the control device in accordance with the manufacturer's specifications.

(b) If the overspray is visibly detected at the exhaust or accumulates on the ground, the source 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.

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

D.1.2 Particulate Emissions [326 IAC 2-8]

In order that the requirements of 326 IAC 2-7 (Part 70 Operating Permit) do not apply, the sourcewide emissions of particulate shall be less than 100 tons per year. The following limits apply:

(a) particulate emissions from the paint booth, identified as unit A, shall not exceed 1.4 pounds of particulate per hour.

(b) particulate emissions from the paint booth, identified as unit B, shall not exceed 1.4 pounds of particulate per hour.

(c) particulate emissions from the spray coating area used for primer application, identified as unit C, shall not exceed 0.084 pounds of particulate per hour.

(d) particulate emissions from the paint coating area, identified as unit D, shall not exceed 4.75 pounds of particulate per hour.

D.1.3 Miscellaneous Metal Coating [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating operations, identified as Units A, B, C, and D shall be limited as follows:

(a) a daily volume weighted average of clear coating shall not exceed 4.3 pounds VOC per gallon less water;

(b) a daily volume weighted average of air dried coatings shall not exceed 3.5 pounds VOC per gallon less water;

(c) a daily volume weighted average of extreme performance coatings shall not exceed 3.5 pounds VOC per gallon less water; and

(d) daily volume weighted average of all other coatings shall not exceed 3.0 pounds VOC per gallon less water.

If more than one of the above limits apply to a specific coating, the least stringent emission limitation shall apply.

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

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 2-8]

In order that the requirements of 326 IAC 2-7 (Part 70 Operating Permit) do not apply, the use of VOC at the emission units identified as A, B, C, D and E, including coatings, dilution solvents, and cleaning solvents shall be less than 98.8 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from the entire source to less than 100 tons per 12 consecutive month period.

D.1.5 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

(a) The total usage of any single hazardous air pollutant (HAP) at the emission units identified as A, B, C, D and E shall be limited to less than 9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period.

(b) The total usage of the combined hazardous air pollutants (HAPs) at the emission units identified as A, B, C, D and E shall be limited to less than 23.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period.

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

D.1.6 Cold Cleaner Degreaser Operations and Control [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, Unit E, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand or foot if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when the solvent which is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2, and 326 IAC 2-8 (FESOP) and in order to comply with D.1.1and D.1.2, the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from Units A, B, and C at all times when they are in operation.

D.1.9 Volatile Organic Compounds (VOC)

(a) Compliance with each of the applicable VOC content limit contained in condition D.1.2 shall be determined for each coating type pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and VCAPC, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) When noncompliant coatings for any of the subdivisions of 326 IAC 8-2-9(d) are used for any particular day for a paint booth, compliance with that particular VOC content limit in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average for each of the subdivisions of 326 IAC 8-2-9(d) shall be determined by the following equation:

$$A = [\sum_{i=1}^{N} (c_i) \times U_i) / \sum U_i]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

D.1.10 Hazardous Air Pollutants (HAPs)

Compliance with the HAP emissions limits in condition D.1.4 shall be determined by one of the following:

(a) The manufacturer's certified product data sheet;

(b) The manufacturer's material safety data sheet;

(c) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples;

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph;

(d) An alternate method approved by IDEM, OAQ, and VCAPC.

Compliance Monitoring Requirements

D.1.11 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SC-1, SC-2, and INT-1 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.12 Record Keeping Requirements

(a) To document compliance with Condition D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2 and D.1.3.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent used less water on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings and solvents used for each day;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below:

(1) The monthly pounds of coatings processed per coating category.

(2) The HAP content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The monthly weight and HAP content of each coating material and solvent used in the surface coating operations.

(4) The total HAP usage for each month.

(5) The weight of HAP usage for each compliance period.

(c) To document compliance with Condition D.1.6, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2, D.1.3, and D.1.4 shall be submitted to the addresses listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification of the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(e) Abrasive blast cabinet, identified as Unit P, installed prior to 1985, with a maximum throughput of 150 pounds per hour or 30 cabinets per hour, using a dust collector as particulate control, and exhausting to stack INT-10.

(f) Body shop sanding, identified as Unit G, installed in 1994, with a maximum throughput of 150 pounds or 30 cabinets per hour, using a dust collector as particulate control, and exhausting to stack INT-4.

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

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

D.2.1 Particulate Emissions Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), the particulate emissions from units P and G shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

D.2.2 Particulate Emissions [326 IAC 2-8]

In order that the requirements of 326 IAC 2-7 (Part 70 Operating Permit) do not apply, the sourcewide emissions of particulate shall be less than 100 tons per year. The following limits apply:

(a) particulate emissions from the abrasive cabinet, identified as unit P, shall not exceed 0.75 pounds of particulate per hour.

(b) particulate emissions from the body shop sanding, identified as unit G, shall not exceed 0.75 pounds of particulate per hour.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.4 Particulate Control [326 IAC 2-8]

In order to comply with Conditions D.2.1 and D.2.2, and in order that the requirements of 326 IAC 2-7 do not apply:

(a) the dust collector for particulate control shall be in operation and control emissions from the Unit P at all times that Unit P is in operation, and

(b) the dust collector for particulate control shall be in operation and control emissions from the Unit G at all times that Unit G is in operation.

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

D.2.5 Record Keeping Requirements

(a) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: All State Manufacturing Co., Inc.
Source Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
Mailing Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
FESOP No.: 167-13892-00101

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46206
Phone: 317-233-5674
Fax: 317-233-5967
and

VIGO COUNTY AIR POLLUTION CONTROL

103 South 3rd Street
Terre Haute, IN 47807

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: All State Manufacturing Co., Inc.
Source Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
Mailing Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
FESOP No.: 167-13892-00101

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must notify the VCAPC, within four (**4**) business hours (812-462-3433); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days to IDEM, OAQ and VCAPC (Facsimile Number: 317-233-5967 & 812-462-3447), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL

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

Source Name: All State Manufacturing Co., Inc.
Source Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
Mailing Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
FESOP No.: 167-13882-00101

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

Page 2 of 2

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Part 70 Quarterly Report

Source Name: All State Manufacturing Co., Inc.
Source Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
Mailing Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
FESOP No.: 167-13892-00101
Facility: Units A, B, C, D, and E
Parameter: A single HAP usage
Limit: Less than 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month using the following equation:

$E = \sum[(U1 \times C_i) + (U2 \times C_i)]$

Where E = A single HAP emissions (tons/month);
U1 = The amount of solvent delivered to Unit E (tons/month);
U2 = The amount of paint, thinner, and cleaning solvent delivered to Units A, B, C, and D (tons/month);
C_i = The weight percentage of a single volatile HAP in each material, i (%);

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month single HAP emission	Previous 11 Months single HAP emission	12 Month Total single HAP emission
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Part 70 Quarterly Report

Source Name: All State Manufacturing Co., Inc.
Source Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
Mailing Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
FESOP No.: 167-13892-00101
Facility: Units A, B, C, D, and E
Parameter: Total HAP Usage
Limit: Less than 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month using the following equation:

Total HAP Emission = $\sum$ (A single HAP emission)

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month Total HAP emission	Previous 11 Months Total HAP emission	12 Month Total Total HAP emission
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Part 70 Quarterly Report

Source Name: All State Manufacturing Co., Inc.
Source Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
Mailing Address: 4024 2nd Parkway, Terre Haute, Indiana 47805
FESOP No.: 167-13892-00101
Facility: Units A, B, C, D, and E
Parameter: Total VOC Usage
Limit: Less than 98.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month Total VOC emission	Previous 11 Months Total VOC emission	12 Month Total Total VOC emission
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality
And
Vigo County Air Pollution Control

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

Source Background and Description

Source Name:	**All State Manufacturing Company, Inc.**
Source Location:	**4024 2nd Parkway, Terre Haute, Indiana 47805**
County:	**Vigo**
SIC Code:	**3381**
Operation Permit No.:	**167-5493-00101**
Operation Permit Issuance Date:	**December 13, 1996**
Permit Renewal No.:	**167-13892-00101**
Permit Reviewer:	**Rob Harmon/KR**

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) have reviewed a FESOP renewal application from All State Manufacturing Co., Inc. relating to the operation of a vending machine rebuilding company.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) paint booth (air atomization), identified as A, installed in 1989, with a maximum capacity of 7.5 gallons per hour, and a maximum throughput capacity of 10 vending machine cabinets per hour, using dry filters as particulate control, and exhausting to stack SC-1.

(b) One (1) paint booth (air atomization), identified as B, installed in 1993, with a maximum coating usage of 7.5 gallons per hour, and a maximum throughput capacity of 10 vending machine cabinets per hour, using dry filters as particulate control, and exhausting to stack SC-2.

(c) One (1) spray coating area (air atomization) used for primer application, identified as C, installed in 1975, with a maximum coating usage of 1.57 gallons per hour, using dry filters as particulate control, and exhausting to stack INT-1.

(d) One (1) spray coating area (air atomization) used for touch-up aerosols, identified as D, installed in 1975, with a maximum coating usage of 4.6 gallons per hour, using no control, and exhausting to stack T1.

(e) Abrasive blast cabinet, identified as Unit P, installed in 1984, with a maximum throughput of 150 pounds per hour or 30 cabinets per hour, using a dust collector as particulate control, and exhausting to stack INT-10.

(f) Body shop sanding, identified as Unit G, installed in 1994, with a maximum throughput of 150 pounds or 30 cabinets per hour, using a dust collector as particulate control, and exhausting to stack INT-4.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:

(1) Natural gas-fired heater, identified as Unit H, installed in 1993, with a maximum heat input capacity of 1.9 MMBtu/hr, using no control, and exhausting to stack INT-5.

(2) Natural gas-fired heater, identified as Unit J, installed in 1993, with a maximum heat input capacity of 1.6 MMBtu/hr, using no control, and exhausting to stack INT-6.

(3) Natural gas-fired heater, identified as Unit K, installed in 1993, with a maximum heat input capacity of 0.6 MMBtu/hr, using no control, and exhausting to stack INT-7.

(4) Natural gas-fired hot water wash tank #1, identified as Unit L, installed in 1975, with a maximum heat input capacity of 0.05 MMBtu/hr, using no control, and exhausting to stack INT-8.

(5) Natural gas-fired hot water wash tank #2, identified as Unit M, installed in 1975, with a maximum heat input capacity of 0.05 MMBtu/hr, using no control, and exhausting to stack INT-9.

(6) Natural gas-fired pressure washer, identified as Unit N, installed in 1995, with a maximum heat input capacity of 0.4 MMBtu/hr, using no control, and exhausting to stack SU-1.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:

(1) Paint gun clean-up area, identified as Unit E, installed in 1975, with a maximum cleaner usage of 2 gallons per year, using no control, and exhausting to stack INT-3.

Existing Approvals

The source has been operating under the previous FESOP 167-5493-00101 issued on December 13, 1996, and the following amendments and revisions:

(a) First Administrative Amendment 167-8298-00101, issued on April 8, 1997, and

(b) Second Administrative Amendment 167-9450-00101, issued on March 12, 1998.

All conditions from previous approvals are incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the FESOP renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on February 6, 2001.

Emission Calculations

See Appendix A of this document for detailed emission (four pages).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	greater than 250
PM-10	greater than 250
SO_2	less than 10
VOC	less than 250 greater than 100
CO	less than 10
NO_x	less than 10
Lead	negligible

HAPs	Unrestricted Potential Emissions (tons/yr)
Methyl Ethyl Ketone	10.23
Isopropyl Alcohol	1.15
Methanol	1.09
Dibutylphthalate	1.09
Hexone	2.93
Toluene	39.0
Xylene	43.38
1,1,1-trichloroethane	0.1
Ethylbenzene	0.44
Styrene	4.79
Ethoxyethanol	0.08
Sodium Metasilicate	0.06
Glycol-n-Propyl	0.06
Total	104.5

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is

made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

	Potential To Emit (tons/year)							
Process/ emission unit	PM	PM-10	SO_2	NO_x	VOC	CO	Single HAP	Combined HAP
Pain Booth #1(Unit A)	6.09	6.09	negligible	negligible	*	negligible		5.8
Paint Booth#2 (Unit B)	6.09	6.09	negligible	negligible	*	negligible		5.8
Primer Spry Area (Unit C)	1.86	1.86	negligible	negligible	*	negligible		1.4
Aerosol Touch Up (Unit D)	20.81	20.81	negligible	negligible	*	negligible		9.9
Body Shop Sanding (Unit G)	6.57	6.57	negligible	negligible	negligible	negligible		negligible
Abrasive Blasting (Unit P)	6.57	6.57	negligible	negligible	negligible	negligible		
Insignificant Activities	0.04	0.15	0.01	2.01	0.11	1.69		0.8
Total Emissions	39.98	40.1	0.01	2.01	99	1.69	9.0	23.7

* VOC emissions from units A, B, C, D and E combined is limited to 98.8 tons/yr.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
8-hour Ozone	basic nonattainment
1-hour Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as basic nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review (326 IAC 2-3).

(b) Vigo County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(c) 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.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	39.98
PM-10	40.01
SO_2	0.01
VOC	97.6
CO	1.69
NO_x	2.01
Single HAP	9.0
Combination HAPs	23.7

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

(b) This existing source is also not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. The natural gas fired units do not generate steam and they have a maximum design heat input capacity of less than ten (10) million Btu per hour (mm Btu/hr). Therefore, this source is not subject to 40 CRF Part 60, Subpart Dc.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM (Miscellaneous Metal Parts and Products) because this source is not a major source for HAPs.
There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)
This source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. The source agreed to limit the emissions of these pollutants to less than the major source thresholds with FESOP 167-5493-00101.Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)
This source is not subject to 326 IAC 2-4.1, because it has not constructed a major source of hazardous air pollutants, as defined in 40 CFR 63 after July 27, 1997.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Vigo County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, source wide emissions of criteria pollutants shall be limited to less than one hundred (100) tons per year such that the source does not fall within any of the categories listed in 326 IAC 2-7-2(a) and compliance shall be assured with all applicable requirements at the time of FESOP issuance (see Emissions Calculations, Appendix A). The potential to emit PM, PM-10, and VOC before limitations from the entire source are greater than 100 tons per year for each of these pollutants. The following limits shall apply to assure compliance with 326 IAC 2-8-4 (FESOP):

1. Particulate Emissions (PM and PM-10) from:

   (a) the paint booth, identified as unit A, shall not exceed 1.4 pounds of particulate per hour. Dry filters as particulate control shall be used at all times the paint booth is in operation.

   (b) the paint booth, identified as unit B shall not exceed 1.4 pounds of particulate per hour. Dry filters as particulate control shall be used at all times the paint booth is in operation.

   (c) the spray coating area used for primer application, identified as unit C, shall not exceed 0.084 pounds of particulate per hour. Dry filters as particulate control shall be used at all times the coating area is in operation.

   (d) the paint coating area, identified as unit D, shall not 4.75 pounds of particulate per hour.

   (e) the abrasive cabinet, identified as unit P, shall not exceed 0.75 pounds of particulate per hour. Dust collector as particulate control shall be used at all times the abrasive cabinet is in operation.

   (f) the body shop sanding, identified as unit G, shall not exceed 0.75 pounds of particulate per hour. Dust collector as particulate control shall be used at all times the body shop sanding is in operation.

   The above limitations result in source wide emissions of PM and PM-10 of less than one hundred tons per year, as shown in Appendix A.

2. Volatile Organic Compounds (VOC):
   The VOC input into the emission units identified as A, B, C, D and E shall not exceed 98.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

   This limitation results in sourcewide emissions of VOC of less than one hundred tons per twelve (12) consecutive month period, as shown in Appendix A.

3. Hazardous Air Pollutants (HAPs):

   The Permittee has chosen to limit the HAPs emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for a single HAP and less than 25 tons per twelve (12) consecutive month period for any combination of HAPs.

   (a) Therefore, the total combined HAPs emissions from emission units A, B, C, D and E shall not exceed 23.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

   (b) The sourcewide emissions of a single HAP shall not exceed 9 tons per twelve

(12) consecutive month period, with compliance determined at the end of each month.

The HAPs emissions shall be calculated using the following equation:

$$E = \sum[(U1 \times C_i) + (U2 \times C_i)]$$

Where E = A single HAP emissions (tons/month);
U1 = The amount of solvent delivered to Unit E (tons/month);
U2 = The amount of paint, thinner, and cleaning solvent delivered to surface coating operations (tons/month);
C_i = The weight percentage of a single volatile HAP in each material, i (%);

The total HAPs emissions equals the summation of all single HAPs emissions calculated by this equation.

326 IAC 5-1 (Opacity Limitations)

This source is located in Vigo County, however, it is not located in the area within 0.5 kilometers radius circle centered at UTM Coordinates Zone 16 East 464.52 kilometers, North 4369.21 kilometers. Therefore the provisions of 326 IAC 5-1-2(2) are not applicable and 326 IAC 5-1-2(1) are applicable to the source. Pursuant to 326 IAC 5-1-2(1) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule does not apply to this source because the potential to emit is less than 25 tons per year and 10 pounds per hour of Sulfur Dioxide.

State Rule Applicability – Unit G (Body Shop Sanding) and Unit P (Abrasive Blast Cabinet)

326 IAC 6-1-2 (Particulate Emissions Limitations)

The particulate emissions from the abrasive blast cabinet, identified as Unit P, and the body shop sanding, identified as Unit G are subject to the requirements of 325 IAC 6-1-2 (Particulate Emissions Limitations) because this source is located in Vigo County, came into existence after June 11, 1973 and although source has potential to emit of particulate emissions less than one hundred (100) tons per year, it also has actual PM emissions greater than ten (10) tons per year. There were no emission statements submitted in the past, hence estimation of actual emissions of particulate was difficult. Therefore, particulate emissions were considered to be greater than 10 ton/yr. Although, PTE of Particulate was limited to less than 100 tpy, 326 IAC 6-1-2 was applied. Pursuant to 326 IAC 6-1-2(a), the particulate emissions from each of these units shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf). These units use dust collectors to comply with these limits.

State Rule Applicability – Surface Coating Units A, B, C and D

326 IAC 6-1-2 (Particulate emission limitations)

The particulate matter emissions from emission units A, B, and C are subject to the requirements of 325 IAC 6-1-2(a) (Particulate Emissions Limitations) because this source is located in Vigo County, came into existence after June 11, 1973 and although the source has potential to emit of particulate emissions lesser than one hundred (100) tons per year, it also has actual PM emissions greater than ten (10) tons per year. Pursuant to 326 IAC 6-1-2(a), the particulate emissions from units A, B, and C shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf). Pursuant to this rule, the allowable particulate matter emissions rate from Units A, B, and C shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

(a) The source shall operate the control device in accordance with the manufacturer's specifications.

(b) If the overspray is visibly detected at the exhaust or accumulates on the ground, the source 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.

If overspray is visibly detected, the source 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.

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

This source is subject to 326 IAC 8-2-9 because it coats metal products under the Standard Industrial Classification (SIC) Code of major group #33. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating operations, identified as Units A, B, C, and D, shall be limited as follows:

(a) Clear coating shall not exceed daily weighted average of 4.3 pounds VOC per gallon less water;
(b) Air dried coatings shall not exceed daily weighted average of 3.5 pounds VOC per gallon less water;
(c) Extreme performance coatings shall not exceed daily weighted average of 3.5 pounds VOC per gallon less water; and
(d) All other coatings shall not exceed daily weighted average of 3.0 pounds VOC per gallon less water.

If more than one of the above limits apply to a specific coating, the least stringent emission limitation shall apply. The source has been submitting reports to show compliance with this rule using the daily weighted average. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

State Rule Applicability – Unit E (Paint Gun Clean up Area)

326 IAC 8-3-5 (Organic Solvent Degreaser Operations and Control)

Pursuant to 8-3-1(b)(A), the paint gun cleanup area is subject to 326 IAC 8-3-5 because it is located at a source in Vigo County that was existing as of January 1, 1980, and perform organic solvent degreasing operations.

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) and 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));
  (B) The solvent is agitated; or
  (C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9OC) (one hundred twenty degrees Fahrenheit (120OF)):

  (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

  (B) A water cover when solvent is used is insoluble in, and heavier than, water.

  (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control) and 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.
(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Requirements

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

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

1. Surface coating operations, identified as Units A, B, and C have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack SC-1, SC-2, and INT-1when one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

   (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

This monitoring requirement is necessary because the filters must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate emission limitations, work practices, and control technologies) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this vending machine rebuilding company shall be subject to the conditions of the FESOP 167-13892-00101.

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

Company Name: **All State Manufacturing Co., Inc.**
Address City IN Zip: **4024 2nd Parkway, Terre Haute, Indiana 46705**
Permit Number: **167-13892-00101**
Reviewer: **Rob Harmon/KR**
Date: **August 3, 2004**

Material	Emission Unit	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	Particulate Potential (ton/yr)	Particulate Control Efficiency	Controlled Particulate Emissions (ton/yr)	Transfer Efficiency
Black Midtone Base	A & B combined	7.4	47.17%	0.0%	47.2%	0.0%	0.00%	0.01	20.00	3.50	3.50	3.07	2.23	80%	0.45	35%
Rustoleum Gloss Black	A & B combined	10.1	34.65%	0.0%	34.7%	0.0%	0.00%	0.01	20.00	3.50	3.50	3.07	3.76	80%	0.75	35%
Epalco Gray Primer	A & B combined	10.7	32.62%	0.0%	32.6%	0.0%	0.00%	0.10	10.00	3.50	3.50	15.33	20.58	80%	4.12	35%
Black Satin Paint	A & B combined	8.3	42.02%	0.0%	42.0%	0.0%	0.00%	0.25	10.00	3.50	3.50	38.33	34.38	80%	6.88	35%
Primer #2 Paint	C	10.0	34.86%	0.0%	34.9%	0.0%	0.00%	0.02	5.00	3.50	3.50	1.53	1.86	80%	0.37	35%
Walnut Bronze	D, worst case VOC	7.7	88.90%	0.0%	88.9%	0.0%	0.00%	1.00	1.57	6.85	6.85	47.07	0.00	0%	0.00	35%
Gloss White	D, worst case PM	7.8	61.00%	0.0%	61.0%	0.0%	0.00%	1.00	1.57	4.73	4.73	0.00	20.81	0%	20.81	0%
State Potential Emissions				**Add worst case coating to all solvents**								**108.40**	**83.62**		**33.37**	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
Company Name: All State Manufacturing Co., Inc.
Address City IN Zip: 4024 2nd Parkway, Terre Haute, Indiana 46705
Permit Number: 167-13892-00101
Reviewer: Rob Harmon/KR
Date: August 3, 2004

	Heat Input Capacity MMBtu/hr
H	1.9
J	1.6
K	0.6
L	0.05
M	0.05
N	0.4
Total	4.6

Potential Throughput MMCF/yr: 40.3

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.15	0.01	2.01	0.11	1.69

*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

HAPs Emissions

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.231E-05	2.418E-05	1.511E-03	3.627E-02	6.850E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.007E-05	2.216E-05	2.821E-05	7.656E-06	4.231E-05

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 MMBt
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 1-03-006-0
(SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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: Emissions Calculations
Units E, G, and P

Company Name: **All State Manufacturing Co., Inc.**
Address City IN Zip: **4024 2nd Parkway, Terre Haute, Indiana 46705**
Permit Number: **167-13892-00101**
Reviewer: **Rob Harmon/KR**
Date: **August 3, 2004**

Unit E (Degreasing)

Pollutant	Emission Factor (lb/gal)	Maximum Throughput (gal/yr)	Potential Emissions (tons/yr)
VOC	0.67	2	0.00067
Methyl Ethyl Ketone	0.11	2	0.00011
Hexane	0.054	2	0.000054
Xylene	0.377	2	0.000377

Units G and P

Cabinets, Doors, and Frames first go through grinding and blasting, Unit P, followed by Sanding, Unit G at a maximum throughput of 150 pounds per hour. Assuming an emissions factor of 100% particulate, the combined emissions are as follows:

150 lbs/hr * 8760 hr/yr * 1 ton / 2000 lbs = 657 tons/yr

After 99% Dust collector efficiency: 6.57 tons/yr

Methodology:

VOC Emissions from Degreasing:
VOC Emissions (tons/yr) = Density (lbs/gal) * throughput (gal/yr) * ton /2000 lbs

Appendix A: Emissions Calculations
Summary

Company Name: **All State Manufacturing Co., Inc.**
Address City IN Zip: **4024 2nd Parkway, Terre Haute, Indiana 46705**
Permit Number: **167-13892-00101**
Reviewer: **Rob Harmon/KR**
Date: **August 3, 2004**

Potential Emissions

Name	Unit	PM	PM10	SO2	NOx	VOC	CO
paint booth	A	30.47	30.47			29.90	
paint booth	B	30.47	30.47			29.13	
spray coating area	C	1.86	1.86			1.53	
spray coating area	D	20.81	20.81			47.07	
paint gun clean-up	E						
blasting and sanding	G and P	657.00	657.00				
Combustion	H, J, K, L, M, N	0.04	0.15	0.01	2.01	0.11	1.69
	Total	**740.66**	**740.78**	**0.01**	**2.01**	**107.74**	**1.69**

Limited Controlled Emissions

Name	Unit	PM	PM10	SO2	NOx	VOC	CO	Single HAP	Combination of HAPs
paint booth	A	6.09	6.09			*			**
paint booth	B	6.09	6.09			*			**
spray coating area	C	0.37	0.37			*			**
spray coating area	D	20.81	20.81			*			**
paint gun clean-up	E					*			**
blasting and sanding	G and P	6.57	6.57						0.1
Combustion	H, J, K, L, M, N	0.04	0.15	0.01	2.01	0.11	1.69		0.1
	Total	**39.98**	**40.10**	**0.01**	**2.01**	**99***	**1.69**	**9.00**	**24**

*VOC usage in emission units A, B, C, D and E combined is limited to 98.8 tons per year so as to limit VOC emissions from the entire source to less 100 tons per year.

**HAP usage in emission units A, B, C, D and E combined is limited to 23.8 tons per year so as to limit HAP emissions from the entire source to less 25 tons per year.