



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

January 7, 2004

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

TO: Interested Parties / Applicant

RE: Herr Custom Paint / 039-18110-00273

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03

January 7, 2004

Mr. Ronald Stitwell
Herr Custom Paint, Inc.
16990 County Road 38
Goshen, Indiana 46526

Re: 039-18110
First Minor Revision to
FESOP 039-13837-00273

Dear Mr. Stitwell:

Herr Custom Paint, Inc. dba Maple City Collision, located at 16990 County Road 38 Goshen, Indiana 46526 was issued a FESOP Renewal on February 19, 2003 for a custom vehicle painting operation. A letter requesting changes to this permit was received on October 24, 2003. Pursuant to the provisions of 326 IAC 2-8-11.1 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the construction of the following emission units:

- (a) One (1) Spray Booth, identified as B-5, equipped with High Volume Low Pressure (HVLP) spray system, with a maximum rated capacity of 1.5 units per hour, with dry filters to control the PM overspray. This paint booth will be used exclusively for painting motor homes and RVs.
- (b) Three (3) natural gas-fired Infra-Red Tubular Heaters, identified as H-1, H-2, and H-3, each has a heat input capacity of 0.80 million British thermal units per hour (mmBtu/hr).
- (c) Two (2) natural gas-fired Make-up Air Units, identified as S-5, each unit has a heat input capacity of 1.2 mmBtu/hr.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit

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

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner
Bruce Carter Associates, LLC - Robert Waugaman

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR QUALITY

**Herr Custom Paint, Inc.
16990 C.R. 38 & Linden Dr.
Goshen, Indiana 46526**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.: F039-13837-00273	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 19, 2002 Expiration Date: February 19, 2007
First Administrative Amendment 039-17262, issued on June 11, 2003	
First Minor Permit Revision No.: 039-18110	Pages Affected: 5, 23, 24, 25, 31 Pages Added: 5a, 31a
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office Of Air Quality	Issuance Date: January 7, 2004

- (f) One (1) Spray Booth, identified as B-5, equipped with High Volume Low Pressure (HVLP) spray system, with a maximum rated capacity of 1.5 units per hour, with dry filters to control the PM overspray. This paint booth will be used exclusively for painting motor homes and Rvs.

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

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

- (a) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) inert gas welding station, identified as F4, constructed in 1995, with a maximum consumption of 1.25 pounds of wire per hour; and
 - (2) One (1) oxyacetylene flame cutting station, identified as F5, constructed in 1995, with a maximum metal cutting rate of 20 inches per minute.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas-fired air makeup unit, identified as A1H, with a maximum heat capacity of 1.32 million Btu per hour;
 - (2) Two (2) paint booth natural gas-fired space heaters, identified as A2H and PH1, each with a maximum input capacity of 1 million Btu per hour;
 - (3) One (1) natural gas-fired air makeup unit, identified as O1H, with a maximum heat input capacity of 0.75 million Btu per hour;
 - (4) Five (5) natural gas-fired radiant space heaters, identified as R1, R2, R3, R4, and R5, each with a maximum heat input capacity of 0.15 million Btu per hour;
 - (5) Two (2) natural gas-fired radiant space heaters, identified as IRH1 and IRH2, each with a heat input capacity of 0.08 million Btu per hour; and
 - (6) One (1) natural gas-fired radiant space heater, identified as IRH3, with a heat input capacity of 0.1 million Btu per hour.
 - (7) Three (3) natural gas-fired Infra-Red Tubular Heaters, identified as H-1, H-2, and H-3, each has a heat input capacity of 0.80 million British thermal units per hour (mmBtu/hr).
 - (8) Two (2) natural gas-fired Make-up Air Units, identified as S-5, each unit has a heat input capacity of 1.2 mmBtu/hr.

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

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

A.6 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) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) paint spray booth, identified as B1, constructed in 1987, with a maximum usage of 1.2 gallons per hour, and equipped with a dry filter for particulate emissions;
- (b) One (1) paint spray booth, identified as B2, constructed in 1991, with a maximum usage of 1.2 gallons per hour, and equipped with a dry filter and water bath for particulate emissions;
- (c) One (1) paint spray booth, identified as B3, constructed in 1992, with a maximum usage of 0.24 gallons per hour, and equipped with a dry filter for particulate emissions;
- (d) One (1) paint prep area, identified as F1, constructed in 1978, with a maximum usage of 0.156 gallons per hour; and
- (e) One (1) paint spray booth, identified as B4, constructed in 1995, with a maximum usage of 0.06 gallons per hour, and equipped with a dry filter and water bath for particulate emissions.
- (f) One (1) Spray Booth, identified as B-5, equipped with High Volume Low Pressure (HVLP) spray system, with a maximum rated capacity of 1.5 units per hour, with dry filters to control the PM overspray. This paint booth will be used exclusively for painting motor homes and RVs.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) The amount of VOCs delivered to the applicators of the spray booths plus the amount of VOCs used for clean-up on the spray booths is less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

Any change or modification which may increase the potential emissions of VOC from the spray booths to above one hundred (100) tons per twelve (12) consecutive month period must be approved by the Office of Air Quality before any such change may occur.

- (b) The paint spray booths customize top coat for less than thirty-five (35) cars per day. Therefore the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) are not applicable.

Any change or modification which may increase the number of cars per day that the spray booth customize top coat for to above thirty-five (35) must be approved by OAQ before any such change may occur.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the PM from the inert gas welding station and the oxyacetylene flame cutting station shall not exceed 0.03 pound per hour for each unit when operating at a process weight rate of 1.25 pounds per hour. This limitation was established using the following formula:

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

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), the surface coating operation at Spray Booth B-5 shall be controlled by a dry filter, waterwash, or an equivalent control device and shall be operated in accordance with manufacturer's specifications.

D.1.3 FESOP Limit [326 IAC 2-8]

The amount of any single hazardous air pollutant (HAP) delivered to the coating applicators from paint booths B1, B2, B3, F1, B4, and B5 plus the amount of any single HAP used for clean-up shall be limited to less than ten (10) tons per twelve (12) consecutive month period. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC input usage including dilution solvents and cleaning solvents from Spray Booth B-5 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit shall make the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 Particulate Matter (PM)

In order to comply with D.1.2, the dry filters and water washes for PM control shall be in operation at all times when the paint booths are in operation.

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

D.1.7 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 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 violation of 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 violation of this permit.

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

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.3, and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1, D.1.3, and D.1.4.
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the months of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month;
 - (5) The weight of VOCs and HAPs emitted for each compliance period; and
 - (6) The number of cars the paint spray booths customize top coat for per day.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

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

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

FESOP Quarterly Report

Source Name: Herr Custom Paint, Inc. dba Maple City Collision
Source Address: 16990 C.R. 38 & Linden Drive, Goshen, Indiana 46526
Mailing Address: 16990 C.R. 38 & Linden Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-13837-00273
Minor Permit Revision: 039-18110
Facility: Spray Booth B-5
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period
with compliance demonstrated at the end of each month

YEAR: _____

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

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

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

FESOP Quarterly Report

Source Name: Herr Custom Paint
 Source Address: 16990 C.R. 38 & Linden Dr., Goshen, Indiana 46526
 Mailing Address: P.O. Box 536, Goshen, Indiana 46526
 FESOP No.: F039-13837-00273
 Facility: Spray Paint Booths
 Parameter: HAPs
 Limit: less than ten (10) tons of a single HAP per twelve (12) consecutive month period

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Herr Custom Paint
 Source Address: 16990 C.R. 38 & Linden Dr., Goshen, Indiana 46526
 Mailing Address: P.O. Box 536, Goshen, Indiana 46526
 FESOP No.: F039-13837-00273
 Facility: Spray Paint Booths
 Parameter: HAPs
 Limit: less than twenty-five (25) tons of any combination of HAPs per twelve (12) consecutive month period

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Herr Custom Paint
Source Address: 16990 C.R. 38 & Linden Dr., Goshen, Indiana 46526
Mailing Address: P.O. Box 536, Goshen, Indiana 46526
FESOP No.: F039-13837-00273

Months: _____ to _____ Year: _____

Page 1 of 2

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: Herr Custom Paint, Inc. dba Maple City Collision
Source Location: 16990 County Road 38 and Linden Drive, Goshen, Indiana 46526
County: Elkhart
SIC Code: 3799, 7532
Operation Permit No.: F039-13837-00273
Minor Permit Revision: 039-18110
Permit Reviewer: Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a FESOP application from Herr Custom Paint, a custom vehicle painting facility relating to the construction and operation of the following new emission units:

- (a) One (1) Spray Booth, identified as B-5, equipped with High Volume Low Pressure (HVLP) spray system, with a maximum rated capacity of 1.5 units per hour, with dry filters to control the PM overspray. This paint booth will be used exclusively for painting motor homes and RVs.
- (b) Three (3) natural gas-fired Infra-Red Tubular Heaters, identified as H-1, H-2, and H-3, each has a heat input capacity of 0.80 million British thermal units per hour (mmBtu/hr).
- (c) Two (2) natural gas-fired Make-up Air Units, identified as S-5, each unit has a heat input capacity of 1.2 mmBtu/hr.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) FESOP 039-5151-00273, issued on December 9, 1996;
- (b) FESOP Renewal 039-13837-00273, issued on February 19, 2002; and
- (c) First Administrative Amendment 039-17262, issued on June 11, 2003.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on October 24, 2003. Additional information was received on October 31, 2003.

Emission Calculations

- (a) Natural Gas Combustion Emissions: See Pages 1 and 2 of 4 TSD Appendix A for detailed emission calculations.
- (b) New Paint Booth B-5: See Pages 3 and 4 TSD Appendix A for detailed emission calculations.

Potential To Emit

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)	Limited Uncontrolled PTE (tons/year)
PM	10.74	4.2
PM-10	10.86	4.24
SO ₂	0.01	0.0
VOC	63.88	<25
CO	1.77	0.69
NO _x	2.10	0.82

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

HAP's	Potential To Emit (tons/year)	Limited PTE (tons/year)
Xylene	19.34	9
Toluene	1.78	
MEK	5.05	
Ethyl Benzene	3.33	
Benzene	4.415E-05	
Dichlorobenzene	2.523E-05	
Formaldehyde	1.577E-03	
Hexane	3.784E-02	
Lead	1.051E-05	
Cadmium	2.313E-05	
Manganese	7.989E-05	

Nickel	4.415E-05	
Worst case HAP	19.34	<10
Combined HAPs	29.54	<25

Note: Since VOC is limited to less than 25 tons per year, all pollutants will also follow using the following methodology:

$$\text{Limited Uncontrolled PTE} = <25 \text{ tons/yr VOC limit} / \text{Total VOC} * \text{pollutant PTE}$$

Justification for the Revision

- (a) The modification's volatile organic compound (VOC) potential to emit (PTE) are greater than 25 tons per year, however, the Permittee requested a limit in VOC throughput in order to restrict the VOC below 25 tons per year to avoid the applicability of 326 IAC 8-1-6. Pursuant to 326 IAC 2-8-11.1(d)(7), a Minor Permit Revision will be applicable; and
- (b) The modification's single HAP potential to emit (PTE) are greater than 10 tons per year, and combined HAPs are greater than 25 tons per year, however, the Permittee requested a limit in HAPs throughput in order to restrict the single HAP below 10 tons per year and combined HAPs below 25 tons per year, pursuant to 326 IAC 2-8-11.1(d)(5). Therefore, a Minor Permit Revision will be applicable.

Source Status

Existing source PSD definition (taken from FESOP 039-13837-00273, issued on February 19, 2003):

Pollutant	Actual Emissions (tons/year)
PM	7.23
PM-10	7.23
SO ₂	0.01
VOC	71.26
CO	1.89
NO _x	2.23

- (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 more, and it is not in one of the 28 listed source categories.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	< 0.21	< 0.27	0.0	< 25	< 0.69	< 0.82
PSD Threshold Level	250	250	250	250	250	250
Source PTE After Modification	< 7.44	7.5	0.01	< 96.26	<2.58	<3.05

Controlled & Limited:

Since VOC is limited to less than 25 tons per year, all pollutants will also follow:

PM Limit	=	25 tons/yr / 63.88 tons/yr * 0.535 ton/yr
	=	< 0.21 tons/yr
PM10 Limit	=	25 tons/yr / 63.88 tons/yr * 0.693 tons/yr
	=	< 0.27 tons/yr
CO Limit	=	25 tons/yr / 63.88 tons/yr * 1.77 tons/yr
	=	< 0.69 ton/yr
NOx Limit	=	25 tons/yr / 63.88 tons/yr * 2.10 tons/yr
	=	< 0.82 tons/yr

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not determined

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

Federal Rule Applicability

- (a) New Source Performance Standards (NSPS):
- (1) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):
- (1) 326 IAC 14 and 40 CFR Part 63, Subpart PPPP - Surface Coating of Plastic Parts and Products. The new Spray Booth, identified as B-5, is **not** subject to this NESHAP since it is **not** major for hazardous air pollutant, nor it is located in a source that is major for hazardous air pollutants.

State Rule Applicability - Entire Source

- (a) 326 IAC 5-1 (Visible Opacity Limitations)
- Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless

otherwise stated in this permit:

- (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 8-1-6 (General Reduction Requirements)
The new Spray Booth, identified as B-5 has a potential VOC emissions of greater than 25 tons per year. However, the Permittee has requested a limit of less than 25 tons per year of VOC usage in order to avoid the applicability of this rule for the new booth.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), the surface coating operation at Spray Booth B-5 shall be controlled by a dry filter, waterwash, or an equivalent control device and shall be operated in accordance with manufacturer's specifications.

The Permittee is in compliance with this rule, as the PM overspray from Spray Booth B-5 will be controlled by dry filters.
- (c) 326 IAC 6-2 (PM Emissions Limit from Indirect Heating Facilities)
The three (3) natural gas-fired Infra-Red Tubular Heaters, identified as H-1, H-2, and H-3, and two (2) natural gas-fired Make-up Air Units, identified as S-5 are not subject to 326 IAC 6-2, as they are not sources of indirect heating.

Changes to the FESOP

1. The FESOP 039-13837-00273, issued on February 19, 2002, will be revised to incorporate the new emission units (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

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

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

- (a) One (1) paint spray booth, identified as B1, constructed in 1987, with a maximum usage of 1.2 gallons per hour, and equipped with a dry filter for particulate emissions;
- (b) One (1) paint spray booth, identified as B2, constructed in 1991, with a maximum usage of 1.2 gallons per hour, and equipped with a dry filter and water bath for particulate emissions;
- (c) One (1) paint spray booth, identified as B3, constructed in 1992, with a maximum usage of 0.24 gallons per hour, and equipped with a dry filter for particulate emissions;
- (d) One (1) paint prep area, identified as F1, constructed in 1978, with a maximum usage of 0.156 gallons per hour; and

- (e) One (1) paint spray booth, identified as B4, constructed in 1995, with a maximum usage of 0.06 gallons per hour, and equipped with a dry filter and water bath for particulate emissions.
- (f) **One (1) Spray Booth, identified as B-5, equipped with High Volume Low Pressure (HVLV) spray system, with a maximum rated capacity of 1.5 units per hour, with dry filters to control the PM overspray. This paint booth will be used exclusively for painting motor homes and RVs.**

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

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

- (a) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) inert gas welding station, identified as F4, constructed in 1995, with a maximum consumption of 1.25 pounds of wire per hour; and
 - (2) One (1) oxyacetylene flame cutting station, identified as F5, constructed in 1995, with a maximum metal cutting rate of 20 inches per minute.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas-fired air makeup unit, identified as A1H, with a maximum heat capacity of 1.32 million Btu per hour;
 - (2) Two (2) paint booth natural gas-fired space heaters, identified as A2H and PH1, each with a maximum input capacity of 1 million Btu per hour;
 - (3) One (1) natural gas-fired air makeup unit, identified as O1H, with a maximum heat input capacity of 0.75 million Btu per hour;
 - (4) Five (5) natural gas-fired radiant space heaters, identified as R1, R2, R3, R4, and R5, each with a maximum heat input capacity of 0.15 million Btu per hour;
 - (5) Two (2) natural gas-fired radiant space heaters, identified as IRH1 and IRH2, each with a heat input capacity of 0.08 million Btu per hour; and
 - (6) One (1) natural gas-fired radiant space heater, identified as IRH3, with a heat input capacity of 0.1 million Btu per hour.
 - (7) **Three (3) natural gas-fired Infra-Red Tubular Heaters, identified as H-1, H-2, and H-3, each has a heat input capacity of 0.80 million British thermal units per hour (mmBtu/hr).**
 - (8) **Two (2) natural gas-fired Make-up Air Units, identified as S-5, each unit has a heat input capacity of 1.2 mmBtu/hr.**

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

- (a) One (1) paint spray booth, identified as B1, constructed in 1987, with a maximum usage of 1.2 gallons per hour, and equipped with a dry filter for particulate emissions;
- (b) One (1) paint spray booth, identified as B2, constructed in 1991, with a maximum usage of 1.2 gallons per hour, and equipped with a dry filter and water bath for particulate emissions;
- (c) One (1) paint spray booth, identified as B3, constructed in 1992, with a maximum usage of 0.24 gallons per hour, and equipped with a dry filter for particulate emissions;
- (d) One (1) paint prep area, identified as F1, constructed in 1978, with a maximum usage of 0.156 gallons per hour; and
- (e) One (1) paint spray booth, identified as B4, constructed in 1995, with a maximum usage of 0.06 gallons per hour, and equipped with a dry filter and water bath for particulate emissions.
- (f) **One (1) Spray Booth, identified as B-5, equipped with High Volume Low Pressure (HVL) spray system, with a maximum rated capacity of 1.5 units per hour, with dry filters to control the PM overspray. This paint booth will be used exclusively for painting motor homes and RVs.**

(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 no change

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the PM from the inert gas welding station and the oxyacetylene flame cutting station shall not exceed 0.03 pound per hour for each unit when operating at a process weight rate of 1.25 pounds per hour. This limitation was established using the following formula:

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

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

- (b) **Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies), the surface coating operation at Spray Booth B-5 shall be controlled by a dry filter, waterwash, or an equivalent control device and shall be operated in accordance with manufacturer's specifications.**

D.1.3 FESOP Limit [326 IAC 2-8]

The amount of any single hazardous air pollutant (HAP) delivered to the **coating** applicators **from paint booths B1, B2, B3, F1, B4, and B5** plus the amount of any single HAP used for clean-up shall be limited to less than ten (10) tons per twelve (12) consecutive month period. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not

applicable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC input usage including dilution solvents and cleaning solvents from Spray Booth B-5 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit shall make the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable.

D.1.4 5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination

D.1.5 6 Particulate Matter (PM) - no change

Compliance Monitoring Requirements

D.1.6 7 no change

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

D.1.78 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, ~~and~~ D.1.3, **and D.1.4** the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1, ~~and~~ D.1.3, **and D.1.4**
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the months of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month;
 - (5) The weight of VOCs and HAPs emitted for each compliance period; and
 - (6) The number of cars the paint spray booths customize top coat for per day.
- (b) To document compliance with Condition ~~D.1.6~~ **D.1.7**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.89 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3 **and D.1.4**

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

2. The following Reporting Form for Spray Booth B-5 will be added in the FESOP:

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

FESOP Quarterly Report

Source Name: Herr Custom Paint, Inc. dba Maple City Collision
Source Address: 16990 C.R. 38 & Linden Drive, Goshen, Indiana 46526
Mailing Address: 16990 C.R. 38 & Linden Drive, Goshen, Indiana 46526
Part 70 Permit No.: T039-13837-00273
Minor Permit Revision: 039-18110
Facility: Spray Booth B-5
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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: _____

Compliance Requirements

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

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

Conclusion

The operation of the Spray Booth B-5 and the miscellaneous natural gas-fired heaters shall be subject to the conditions of the attached **Minor Permit Revision 039-18110-00273**.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Herr Custom Paint Inc., dba Maple City Collision

Address City IN Zip: 16990 County Road 38 and Linden Drive, Goshen, IN 46526

MPR No.: 039-18110

Plt ID: 039-00273

Reviewer: Aida De Guzman

Date Application Received: October 24, 2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3 @ .80 mmBtu/hr each infra-red heaters
2 @ 1.2 mmBtu/hr each air make-up units

4.8

42.0

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	0.16	0.01	2.10	0.12	1.77

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Herr Custom Paint Inc., dba Maple City Collision

Address City IN Zip: 16990 County Road 38 and Linden Drive, Goshen, IN 46526

MPR No.: 039-18110

Plt ID: 039-00273

Reviewer: Aida De Guzman

Date Application Received: October 24, 2003

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.415E-05	2.523E-05	1.577E-03	3.784E-02	7.148E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.051E-05	2.313E-05	2.943E-05	7.989E-06	4.415E-05

Methodology is the same as page 1.

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

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

Company Name: Herr Custom Paint Inc., dba Maple City Collision
Address City IN Zip: 16990 County Road 38 and Linden Drive, Goshen, IN 46526
MPR No.: 039-18110
Pit ID: 039-00273
Reviewer: Aida De Guzman
Date Application Received: October 24, 2003

Paint Booth B-5																
Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Primer/Sealer																
Ultra-Fill II Acr. Urethane Sealer	11.25	32.46%	0.0%	32.5%	0.0%	50.00%	0.37500	1.500	3.65	3.65	2.05	49.30	9.00	4.68	7.30	75%
Base Coat																
Metallic 3	7.83	78.29%	0.0%	78.3%	0.0%	16.00%	0.19300	1.500	6.13	6.13	1.77	42.59	7.77	0.54	38.31	75%
Bright Metallic Medium	7.75	79.13%	0.0%	79.1%	0.0%	16.00%	0.17400	1.500	6.13	6.13	1.60	38.41	7.01	0.46	38.33	75%
HS Black	8.00	54.65%	0.0%	54.7%	0.0%	40.00%	0.05300	1.500	4.37	4.37	0.35	8.34	1.52	0.32	10.93	75%
HS Low Opacity Yellow	8.50	54.26%	0.0%	54.3%	0.0%	37.00%	0.00800	1.500	4.61	4.61	0.06	1.33	0.24	0.05	12.47	75%
Tinting Base, Exterior Flat Base	9.25	54.40%	0.0%	54.4%	0.0%	32.00%	0.00500	1.500	5.03	5.03	0.04	0.91	0.17	0.03	15.73	75%
Frost White	8.75	64.71%	0.0%	64.7%	0.0%	22.00%	0.00300	1.500	5.66	5.66	0.03	0.61	0.11	0.02	25.74	75%
Basecoat Stabilizer	7.25	97.28%	0.0%	97.3%	0.0%	3.00%	0.43700	1.500	7.05	7.05	4.62	110.95	20.25	0.14	235.09	75%
Clear Coat																
Fast Clearcoat	7.75	53.70%	15.0%	38.7%	0.0%	34.00%	0.58300	1.500	3.00	3.00	2.62	62.95	11.49	3.44	8.82	75%
Clearcoat Overall Hardener	8.33	50.54%	0.0%	50.5%	0.0%	43.00%	0.14600	1.500	4.21	4.21	0.92	22.13	4.04	0.99	9.79	75%
Transducer Solvent #2	7.50	100.00%	70.0%	30.0%	0.0%	0.00%	0.14600	1.500	2.25	2.25	0.49	11.83	2.16	0.00	ERR	75%
Solvent	9.83	100.00%	80.0%	20.0%	0.0%	0.00%	0.00000	0.000	1.97	1.97	0.00	0.00	0.00	0.00	ERR	75%

State Potential Emissions

Add worst case coating to all solvents

14.56	349.35	63.76	10.66
PM/PM10 Controlled Emissions			
			0.535

Note: This paint booth will be used exclusively for painting motor homes and RVs, and will not be used in the custom painting operation, that is being done by existing booths. The source has suggested to consider the worst case by adding all coatings emission, since no "as applied" coatings information was submitted.

Dry Filters - 95% control efficiency
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: Emission Calculations
HAP Emission Calculations

Company Name: Herr Custom Paint Inc., dba Maple City Collision
Address City IN Zip: 16990 County Road 38 and Linden Drive, Goshen, IN 46526
MPR No.: 039-18110
Pit ID: 039-00273
Reviewer: Aida De Guzman
Date Application Received: October 24, 2003

Paint Booth B-5											
Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Primer/Sealer											
Ultra-Fill II Acr. Urethane Sealer	11.25	0.37500	1.500	8.00%	6.00%	0.00%	1.00%	2.22	1.66	0.00	0.28
Base Coat											
Metallic 3	7.83	0.19300	1.500	28.00%	0.00%	0.00%	5.00%	2.78	0.00	0.00	0.50
Bright Metallic Medium	7.75	0.17400	1.500	29.00%	0.00%	0.00%	5.00%	2.57	0.00	0.00	0.44
HS Black	8.00	0.05300	1.500	38.00%	2.00%	0.00%	7.00%	1.06	0.06	0.00	0.19
HS Low Opacity Yellow	8.50	0.00800	1.500	37.00%	3.00%	0.00%	6.00%	0.00	0.01	0.00	0.03
Tinting Base, Exterior Flat Base	9.25	0.00500	1.500	17.00%	11.00%	0.00%	3.00%	0.05	0.03	0.00	0.01
Frost White	8.75	0.00300	1.500	28.00%	11.00%	0.00%	5.00%	0.05	0.02	0.00	0.01
Basecoat Stabilizer	7.25	0.43700	1.500	51.00%	0.00%	0.00%	9.00%	10.62	0.00	0.00	1.87
Clear Coat											
Fast Clearcoat	7.75	0.58300	1.500	0.00%	0.00%	17.00%	0.00%	0.00	0.00	5.05	0.00
Clearcoat Overall Hardener	8.33	0.14600	1.500	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Transducer Solvent #2	7.50	0.14600	1.500	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Solvent	9.83	0.00000	0.000	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00

Total State Potential Emissions

19.34	1.78	5.05	3.33
19.34			
29.50			

Worst Single HAP
Combined HAPs

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs