



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: July 14, 2005
RE: Steve Reiff, Inc. / 183-18629-00031
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 1/10/05



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Steve Reiff, Inc.
5650 W. 800 S.
South Whitley, Indiana 46787**

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

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

Operation Permit No.: MSOP 183-18629-00031	
Original signed by Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: July 14, 2005 Expiration Date: July 14, 2010

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary grain carts and front loading cement mixers surface coating source.

Authorized Individual: Vice President
Source Address: 5650 W. 800 S., South Whitley, IN 46787
Mailing Address: Same as above
General Source Phone: (260) 723-4360
SIC Code: 3479
County Location: Whitley
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4, constructed in 1999, each with a maximum capacity of 0.5 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PB1-1, PB1-2, PB1-3, and PB1-4, respectively;
- (b) One (1) cement mixer coating booth, identified as 1-5, constructed in 1999 with a maximum capacity of 0.05 cement mixers per hour, using dry filters as particulate control, and exhausting to stack PB1-5;
- (c) Four (4) discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4, constructed in 1999, each with a maximum capacity of 0.056 mixer trucks per hour, using dry filters as particulate control, and exhausting to stacks PR3-1, PR3-2, PR3-3, and PR3-4, respectively;
- (d) Two (2) front discharge mixer truck surface coating booths, identified as 3-5 and 3-6, constructed in 2000, with a combined maximum capacity of 0.028 mixer trucks per hour, using dry filters as particulate control and exhausting to stacks PR3-5 and PR3-6, respectively;
- (e) One (1) enclosed sand blaster, identified as BB-1, constructed in 1999 with a maximum capacity of 519 pounds of abrasive per hour, exhausting inside the building; and
- (f) Nine (9) natural gas fired radiant space heaters, each rated at 0.975 million British thermal units (MMBtu) per hour, exhausting to the interior of the building.

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

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

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

B.5 Modification to Permit [326 IAC 2]

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

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

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2]
[IC13-17-3-2][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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

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

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

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.3 Opacity [326 IAC 5-1]

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

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

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements

C.8 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.

Record Keeping and Reporting Requirements

C.9 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.10 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.11 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-5] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, 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.

SECTION D.1

EMISSIONS UNITS OPERATION CONDITIONS

Facility Description:

- (a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4, constructed in 1999, each with a maximum capacity of 0.5 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PB1-1, PB1-2, PB1-3, and PB1-4, respectively;
- (b) One (1) cement mixer coating booth, identified as 1-5, constructed in 1999 with a maximum capacity of 0.05 cement mixers per hour, using dry filters as particulate control, and exhausting to stack PB1-5;
- (c) Four (4) discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4, constructed in 1999, each with a maximum capacity of 0.056 mixer trucks per hour, using dry filters as particulate control, and exhausting to stacks PR3-1, PR3-2, PR3-3, and PR3-4, respectively;
- (d) Two (2) front discharge mixer truck surface coating booths, identified as 3-5 and 3-6, constructed in 2000, with a combined maximum capacity of 0.028 mixer trucks per hour, using dry filters as particulate control and exhausting to stacks PR3-5 and PR3-6, respectively.

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of, for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at each spray booth, identified as 1-1, 1-2, 1-3, 1-4, 1-5, 3-1, 3-2, 3-3, 3-4, 3-5 and 3-6.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of each spray booth, identified as 1-1, 1-2, 1-3, 1-4, 1-5, 3-1, 3-2, 3-3, 3-4, 3-5 and 3-6, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from each surface coating booth shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content limit contained in Condition D.1.1 shall be determined 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, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the 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 shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

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.1.7 Particulate Control

In order to comply with condition D.1.3, the dry filters for PM control shall be in operation and control emissions from the spray booths at all times that the spray booths are in operation.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used 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 solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day;
 - (4) The daily cleanup solvent usage; and

- (5) The total VOC usage for each day.
- (b) To document compliance with Condition D.1.3, 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.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (a) One (1) enclosed sand blaster, identified as BB-1, constructed in 1999 with a maximum capacity of 519 pounds of abrasive per hour, exhausting inside the building; and
- (b) Nine (9) natural gas fired radiant space heaters, each rated at 0.975 million British thermal units (MMBtu) per hour, exhausting to the interior of the building.

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

Emission Limitations and Standards

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emitted from the sand blaster, identified as BB-1, shall be limited to 1.66 pounds per hour when operating at a process weight rate of 519 pounds of abrasive per hour based on the following:

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) The total area of all natural draft openings in the enclosure for sand blaster, identified as BB-1, shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor and ceiling.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall perform testing using Method 204 to verify PM control efficiency in order to demonstrate compliance with the emission limit in Condition D.1.1 (a) and to determine whether the permanent enclosure for the sand blaster, identified as BB-1, meets the criteria for a total enclosure in Condition D.1.1 (b). Such testing shall be conducted within 180 days of the issuance of this permit and in accordance with Section C- Performance Testing.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Steve Reiff, Inc.
Address:	5650 W. 800 S.
City:	South Whitley, IN
Phone #:	(260) 723-4360
MSOP #:	183-18629-00031

I hereby certify that Steve Reiff, Inc. is still in operation.
 no longer in operation.

I hereby certify that Steve Reiff, Inc. is in compliance with the requirements of MSOP 183-18629-00031.
 not in compliance with the requirements of MSOP 183-18629-00031.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____ / ____ / 19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____ / ____ / 19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Steve Reiff, Inc.
Source Location:	5650 W. 800 S., South Whitley, IN 46787
County:	Whitley
SIC Code:	3479
Operation Permit No.:	183-11150-00031
Operation Permit Issuance Date:	December 9, 1999
Operating Permit Renewal No.:	183-18629-00031
Permit Reviewer:	Gaurav Shil/EVP

The Office of Air Quality (OAQ) has reviewed a MSOP renewal application from Steve Reiff, Inc. relating to the operation of a surface coating operation for primary grain carts and finishing front loading cement mixers.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4, constructed in 1999, each with a maximum capacity of 0.5 grain carts per hour, using dry filters as particulate control, and exhausting to stacks PB1-1, PB1-2, PB1-3, and PB1-4, respectively;
- (b) One (1) cement mixer coating booth, identified as 1-5, constructed in 1999 with a maximum capacity of 0.05 cement mixers per hour, using dry filters as particulate control, and exhausting to stack PB1-5;
- (c) Four (4) discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4, constructed in 1999, each with a maximum capacity of 0.056 mixer trucks per hour, using dry filters as particulate control, and exhausting to stacks PR3-1, PR3-2, PR3-3, and PR3-4, respectively;
- (d) Two (2) front discharge mixer truck surface coating booths, identified as 3-5 and 3-6, constructed in 2000, with a combined maximum capacity of 0.028 mixer trucks per hour, using dry filters as particulate control and exhausting to stacks PR3-5 and PR3-6, respectively;
- (e) One (1) enclosed sand blaster, identified as BB-1, constructed in 1999 with a maximum capacity of 519 pounds of abrasive per hour, exhausting inside the building; and
- (f) Nine (9) natural gas fired radiant space heaters, each rated at 0.975 million British thermal units (MMBtu) per hour, exhausting to the interior of the building.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

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

- (a) Minor Source Operating Permit No. 183-11150-00031, issued on December 9, 1999;
- (b) Minor Permit Revision No. 183-11619, issued on March 6, 2000;
- (c) Review Request No. 183-15631, issued on April 22, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit.

The following condition from MSOP No. 183-11150-00031, issued on December 9, 1999, and revised with Minor Permit Revision No. 183-11619, issued on March 6, 2000, has been determined no longer applicable; therefore, was not incorporated into this MSOP renewal:

- (a) Condition D.1.2 (a)

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

- (a) The particulate matter (PM) from the spray booths shall be limited by the following:

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

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

Reason not incorporated: The spray booths (ID's 1-1,1-2, 1-3, 1-4, 1-5, 3-1, 3-2, 3-3, 3-4, 3-5 and 3-6) are not subject to the requirements of this rule because pursuant to 326 IAC 6-3-2 (a), any manufacturing process listed in subsections (b) through (d) of 326 IAC 6-3-2 shall follow the work practices and control technologies contained therein. Surface coating manufacturing processes are listed in 326 IAC 6-3-2 (d) and shall follow the work practices and control technologies listed therein.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
PB1-1	paint booth	28	4.00	28,800	ambient
PB1-2	paint booth	28	2.83	30,000	ambient
PB1-3	paint booth	31	2.83	15,000	ambient
PB1-4	paint booth	29	2.83	15,000	ambient
PB1-5	paint booth	28	2.83	30,000	ambient

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
PR3-1	paint booth	23	2.83	16,830	ambient
PR3-2	paint booth	23	2.83	16,830	ambient
PR3-3	paint booth	23	2.83	16,830	ambient
PR3-4	paint booth	23	2.83	16,830	ambient
PR3-5	paint booth	28	3.5	28,800	ambient
PR3-6	paint booth	28	3.5	28,800	ambient

Recommendation

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

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

An application for the purposes of this review was received on January 15, 2004, with additional information received on March 9, 2005 and May 23, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 7)

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	42.07
PM-10	42.29
SO ₂	0.02
VOC	72.54
CO	3.23
NO _x	3.84

HAPs	Potential to Emit (tons/yr)
Individual HAP	<10
Total HAPs	<25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all pollutants is less than 100 tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of particulate matter less than ten microns in size (PM₁₀), particulate matter and volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not a major source of HAPs as defined in 326 IAC 2-7-1(22).
- (c) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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.

County Attainment Status

The source is located in Whitley County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. Whitley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Whitley County has been classified as attainment or unclassifiable in Indiana for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (c) Whitley County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD 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	4.98
PM-10	5.20
SO ₂	0.02
VOC	72.54
CO	3.23
NO _x	3.84
Single HAP	8.91 (Methyl Ethyl Ketone)
Combination HAPs	21.05

- (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) These emissions were based on the MSOP renewal application submitted by the applicant on January 15, 2004.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 183-18629-00031, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.390), Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, are not included in the permit for the surface coating operations because this rule applies to automobile or light duty truck assembly plants and this source is not an automobile or light duty truck assembly plant.
- (b) Pursuant to 40 CFR 60.451, large appliance surface coating line means that portion of a large appliance assembly plant engaged in the application and curing of organic surface coatings on large appliance parts or products. Large appliance part means any organic surface-coated metal lid, door, casing, panel, or other interior or exterior metal part or accessory that is assembled to form any large appliance product like organic surface-coated metal range, oven, microwave oven, refrigerator, freezer, washer, dryer, dishwasher, water heater, or trash compactor manufactured for household, commercial, or recreational use. The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.450), Subpart SS, Standards of Performance for Industrial Surface Coating: Large Appliances apply to each surface coating operation in a large appliance surface coating line that commenced construction, modification, or reconstruction after December 24, 1980. The source does not have any large appliance surface coating line and hence the requirements of 40 CFR 60.450, Subpart SS are not included in the permit.

- (c) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.720), Subpart TTT, Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, are not included in the permit for the surface coating operations because the Permittee does not apply prime coats, color coats, texture coats, or touch-up coats to plastic parts for use in the manufacture of business machines.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 40 CFR Part 61) included in this permit.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart NNNN are not included in the permit since the source is not a major source of HAPs as defined in 40 CFR 63, subpart A.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart IIII are not included in the permit since the source is not a major source of HAPs as defined in 40 CFR 63, subpart A.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM are not included in the permit since this regulation is applicable to surface coating of miscellaneous metal parts or products, as described in 40 CFR 63.3881 (a)(1) at a major source of HAPs, and this source is not a major source of HAPs as defined in 40 CFR 63, subpart A.

State Rule Applicability – Entire Source

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

This source, constructed in 1999, which is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, is not subject to the requirements of 326 IAC 2-2 (PSD). The potential emissions of all attainment criteria pollutants are less than 250 tons per year, therefore, this source is not a major PSD source.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2 (d), particulate from each spray booth, identified as 1-1, 1-2, 1-3, 1-4, 1-5, 3-1, 3-2, 3-3, 3-4, 3-5 and 3-6, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The particulate from the one (1) sand blaster, identified as BB-1, shall be limited to 1.66 pounds per hour when operating at a process weight rate of 519 pounds of abrasive per hour based on the following:

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:

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

The total area of all natural draft openings in the enclosure for sand blaster, identified as BB-1, shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor and ceiling.

As shown in the emission calculations, the one (1) sand blaster, identified as BB-1, has a potential to emit (PTE) PM less than 1.66 pounds per hour and the source is in compliance with the requirement. (See emission calculations, Appendix A page 7 of 7)

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

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) is applicable to the surface coating of any industrial category which coats metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, and #39. The Permittee coats metal parts or products under the Standard Industrial Classification Code 3479. Therefore, the following facilities shall be subject to the requirements of 326 IAC 8-2-9:

- (a) Four (4) grain cart surface coating booths, identified as 1-1, 1-2, 1-3, 1-4;
- (b) One (1) cement mixer coating booth, identified as 1-5;
- (c) Four (4) discharge mixer truck surface coating booths, identified as 3-1, 3-2, 3-3, 3-4; and
- (d) Two (2) front discharge mixer truck surface coating booths, identified as 3-5 and 3-6.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at each spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

The volume-weighted average VOC content shall be determined by use of the equation:

$$A = \frac{\sum (C \times U)}{\sum U}$$

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.

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.

Based on the MSDS submitted by the source and calculations made, each spray booth is in compliance with this requirement.

Conclusion

The operation of this primary grain carts and front loading cement mixers surface coating source shall be subject to the conditions of the Minor Source Operating Permit 183-18629-00031.

Appendix A: Emission Calculations

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
MSOP: 183-18629-00031
Reviewer: Gaurav Shil/EVP
SIC Code: 3479

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Surface Coating	Abrasive Blasting*	TOTAL
PM	0.07	37.85	4.15	42.07
PM10	0.29	37.85	4.15	42.29
SO2	0.02	0.00	0.00	0.02
NOx	3.84	0.00	0.00	3.84
VOC	0.21	72.33	0.00	72.54
CO	3.23	0.00	0.00	3.23
total HAPs	0.07	20.98	0.00	21.05
worst case single HAP	0.07	8.91	0.00	
	Hexane	Methyl Ethyl Ketone		

Total emissions based on rated capacity at 8,760 hours/year.

* PM and PM10 emissions are controlled by an enclosure with 95% PM reduction. Please also refer note on page 6 of 7.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Surface Coating	Abrasive Blasting	TOTAL
PM	0.07	0.76	4.15	4.98
PM10	0.29	0.76	4.15	5.20
SO2	0.02	0.00	0.00	0.02
NOx	3.84	0.00	0.00	3.84
VOC	0.21	72.33	0.00	72.54
CO	3.23	0.00	0.00	3.23
total HAPs	0.07	20.98	0.00	21.05
worst case single HAP	0.07	8.91	0.00	
	Hexane	Methyl Ethyl Ketone		

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations
VOC and Particulate from Surface Coating Booths

Company Name: Steve Reiff, Inc.
 Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
 MSOP: 183-18629-00031
 Reviewer: Gaurav Shil/EVP
 SIC Code: 3479

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*
Four (4) Mixer Truck Surface Coating Booths (Booth Nos. 3-1, 3-2, 3-3 and 3-4) and One (1) Cement Mixer Coating Booth (Booth No. 1-5) (Plant 3)																
3480S (Clearcoat)	7.98	47.82%	0.0%	47.8%	0.0%	45.12%	4.00000	0.233	3.82	3.82	3.56	85.36	15.58	4.25	n/a	75%
N2225HN (Topcoat)	9.01	41.39%	0.0%	41.4%	0.0%	49.75%	9.40000	0.233	3.73	3.73	8.17	196.03	35.77	12.66	n/a	75%
P5-934 (Primer)	12.15	27.80%	0.0%	27.8%	0.0%	72.16%	5.83000	0.233	3.38	3.38	4.59	110.12	20.10	13.05	n/a	75%
A1-936 (Primer)	7.87	45.00%	0.0%	45.0%	0.0%	55.00%	1.17000	0.233	3.54	3.54	0.97	23.17	4.23	1.29	n/a	75%
Imron 193S (Activator)	9.01	25.82%	0.0%	25.8%	0.0%	69.92%	3.10000	0.233	2.33	2.33	1.68	40.33	7.36	5.29	n/a	75%
Imron 389S (Accelerator)	8.13	99.00%	0.0%	99.0%	0.0%	1.00%	0.19000	0.233	8.05	8.05	0.36	8.55	1.56	0.00	n/a	75%
10.20												244.91	44.70	18.34		
Two (2) Front Discharge Mixer Truck Surface Coating Booths (Booth Nos. 3-5 and 3-6)																
3480S (Clearcoat)	7.98	47.82%	0.0%	47.8%	0.0%	45.12%	4.00000	0.028	3.82	3.82	0.43	10.26	1.87	0.51	n/a	75%
N2225HN (Topcoat)	9.01	41.39%	0.0%	41.4%	0.0%	49.75%	9.40000	0.028	3.73	3.73	0.98	23.56	4.30	1.52	n/a	75%
P5-934 (Primer)	12.15	27.80%	0.0%	27.8%	0.0%	72.16%	5.83000	0.028	3.38	3.38	0.55	13.23	2.42	1.57	n/a	75%
A1-936 (Primer)	7.87	45.00%	0.0%	45.0%	0.0%	55.00%	1.17000	0.028	3.54	3.54	0.12	2.78	0.51	0.16	n/a	75%
Imron 193S (Activator)	9.01	25.82%	0.0%	25.8%	0.0%	69.92%	3.10000	0.028	2.33	2.33	0.20	4.85	0.88	0.64	n/a	75%
Imron 389S (Accelerator)	8.13	99.00%	0.0%	99.0%	0.0%	1.00%	0.19000	0.028	8.05	8.05	0.04	1.03	0.19	0.00	n/a	75%
1.23												29.43	5.37	2.20		
Four (4) Mixer Truck Surface Coating Booths (Booth Nos. 1-1, 1-2, 1-3 and 1-4) (Plant 1)																
PPG CRE-904 (Primer)	11.20	25.00%	0.0%	25.0%	0.0%	75.00%	0.75000	2.000	2.80	2.80	4.20	100.80	18.40	13.80	n/a	75%
CRE-91 (Catalyst)	8.18	21.57%	0.0%	21.6%	0.0%	78.43%	0.25000	2.000	1.76	1.76	0.88	21.17	3.86	3.51	n/a	75%
5.08												121.97	22.26	17.31		
Total Uncontrolled Potential Emissions											16.51	396.31	72.33	37.85		
Controlled Potential Emissions																

Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	98.00%	16.51	396.31	72.33	0.76

Total Potential Emissions	VOC	PM/PM10
Uncontrolled (tons/yr)	72.33	37.85
Controlled (tons/yr)	72.33	0.76

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)
 * Transfer Efficiency for airless (HVLP) spraying and flat coated surface is 75%.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Steve Reiff, Inc.
 Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
 MSOP: 183-18629-00031
 Reviewer: Gaurav Shil/EVP
 SIC Code: 3479

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % MIK	Weight % Hexamethylene- 1,6-diisocyanate	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIK Emissions (ton/yr)	Hexamethylen e-1,6- diisocyanate Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Four (4) Mixer Truck Surface Coating Booths (Booth Nos. 3-1, 3-2, 3-3 and 3-4) and One (1) Cement Mixer Coating Booth (Booth No. 1-5) (Plant 3)															
N2225HN	9.01	9.40000	0.233	1%						0.86	0.00	0.00	0.00	0.00	0.00
Imron 193S	9.01	3.10000	0.233					0.30%		0.00	0.00	0.00	0.00	0.09	0.00
Imron 389S	8.13	0.19000	0.233							0.00	0.00	0.00	0.00	0.00	0.00
P5-934	12.15	5.83000	0.233	2%		11%				1.45	0.00	7.95	0.00	0.00	0.00
A1-936	7.87	1.17000	0.233	28%					9%	2.63	0.00	0.00	0.00	0.00	0.85
Two (2) Front Discharge Mixer Truck Surface Coating Booths (Booth Nos. 3-5 and 3-6)															
N2225HN	9.01	9.40000	0.028	1%						0.10	0.00	0.00	0.00	0.00	0.00
Imron 193S	9.01	3.10000	0.028					0.30%		0.00	0.00	0.00	0.00	0.01	0.00
Imron 389S	8.13	0.19000	0.028							0.00	0.00	0.00	0.00	0.00	0.00
P5-934	12.15	5.83000	0.028	2%		11%				0.17	0.00	0.96	0.00	0.00	0.00
A1-936	7.87	1.17000	0.028	28%					9%	0.32	0.00	0.00	0.00	0.00	0.10
Four (4) Mixer Truck Surface Coating Booths (Booth Nos. 1-1, 1-2, 1-3 and 1-4) (Plant 1)															
PPG CRE-904 Primer	11.20	0.75000	0.500		5%		20%			0.00	0.92	0.00	3.68	0.00	0.00
CRE-91 Catalyst	8.18	0.25000	0.500	20%						0.90	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions (Individual HAP)	6.43	0.92	8.91	3.68	0.10	0.95
Total Combined HAP Potential Emissions	20.98					

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

Appendix A: Emissions Calculations
Natural Gas Fired Radiant Space Heaters - MMBtu/hr < 100

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
MSOP: 183-18629-00031
Reviewer: Gaurav Shil/EVP
SIC Code: 3479

Heat Input Capacity
MMBtu/hr
8.775

Potential Throughput
MMCF/yr
76.87 Nine (9) Space Heaters, each rated @ 0.975 MMBtu/hr

	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	0.07	0.29	0.02	3.84	0.21	3.23

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Fired Radiant Space Heaters - MMBtu/hr < 100
HAP Emissions

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
MSOP: 183-18629-00031
Reviewer: Gaurav Shil/EVP
SIC Code: 3479

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	8.071E-05	4.612E-05	2.883E-03	6.918E-02	1.307E-04

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	1.922E-05	4.228E-05	5.381E-05	1.461E-05	8.071E-05

Methodology is the same as page 4.

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: Emission Calculations
Abrasive Blasting - Sand Blaster (BB-1)

Company Name: Steve Reiff, Inc.
 Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
 MSOP: 183-18629-00031
 Reviewer: Gaurav Shil/EVP
 SIC Code: 3479

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	1.00

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

462
99
99
0.375
0.375

Flow Rate (FR) (lb/hr) = 462 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =
 PM reduction due to total permanent enclosure =

0.041
462
0 %
1
95 %

Potential Emissions = 4.15 tpy

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)

E = EF x FR x (1-w/200) x N

PM and PM10 emissions are controlled by an enclosure with 95% PM reduction.

Note: Pursuant to letter dated March 9, 2005, the Permittee performed Method-204 analysis: Criteria for and verification of a permanent or temporary total enclosure (TTE) for determining capture efficiency. The total area of the two (2) Natural Draft Openings (NDO) is less than 5% of the surface area of the enclosure's four walls, floor and ceiling. Also, each NDO in the enclosure remains open during operations of the facility and is not connected to a duct in which a fan is installed.

**Appendix A: Emission Calculations
Abrasive Blasting - Sand Blaster (BB-1)**

Company Name: Steve Reiff, Inc.
Address City IN Zip: 5650 W. 800 S. South Whitley, IN 46787
MSOP: 183-18629-00031
Reviewer: Gaurav Shil/EVP
SIC Code: 3479

Compliance with 326 IAC 6-3-2

Pursuant to 326 IAC 6-3-2 (e) (3), allowable Particulate Emissions = $4.1(P)^{0.67}$ 1.66 pounds per hour

Controlled emissions= 0.95 <<< 1.66 hence this process complies with 326 IAC 6-3-2.