



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 14, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant

RE: By-Pass Paint Shop, Inc. / 039-18700-00058

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



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June 14, 2004

Mr. John Wallace
By-Pass Paint Shop, Inc.
1132 North Nappanee
Elkhart, Indiana 46514

Re: 039-18700-00058
First Minor Source Modification to:
Part 70 permit No. T039-15592-00058

Dear Mr. Wallace:

By-Pass Paint Shop, Inc. was issued a Part 70 operating permit (T039-15592-00058) on March 25, 2003 for a wood molding surface coating operation. An application to modify the source was received on March 23, 2004. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for modification at the source:

- (d) One (1) vacuum coater used to apply water-borne coatings, identified as VC, with a maximum throughput rate of 600 wood units per hour. This unit will be constructed in 2004.
- (e) One (1) UV Finishing system, identified as UV, with a maximum throughput rate of 99.0 wood units per hour. This unit will be constructed in 2004.

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 and 326 IAC 2-7-10.5(i), 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.



6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanober Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/SD

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**By Pass Paint Shop, Inc.
1132 North Nappanee Street
Elkhart, Indiana 46514**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-15592-00058	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 25, 2003 Expiration Date: March 25, 2008
First Minor Source Modification: No. 039-18700-00058	Pages Affected: 2, 3
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 14, 2004

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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wood molding surface coating operation.

Responsible Official:	President
Source Address:	1132 N. Nappanee Street, Elkhart, Indiana 46514
Mailing Address:	1132 N. Nappanee Street, Elkhart, Indiana 46514
General Source Phone Number:	(574) 264-5334
SIC Code:	2499
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source under Section 112 of the Clear Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Three (3) flow coaters, collectively identified as FC, all constructed in 1971, with a combined maximum capacity of 200 units per hour, and exhausting to Stack ID#1;
- (b) Two (2) lithographic printers, collectively identified as INK, both constructed in 1971, with a combined maximum capacity of 202 units per hour, and exhausting to Stack ID#3; and
- (c) One (1) paint booth with HVLP spray application, identified as PB, constructed in 1971, with a maximum capacity of 33 units per hour, with particulate emissions controlled by dry filters, and exhausting to Stack ID#2.
- (d) One (1) vacuum coater used to apply water-borne coatings, identified as VC, with a maximum throughput rate of 600 wood units per hour. This unit will be constructed in 2004.
- (e) One (1) UV Finishing system, identified as UV, with a maximum throughput rate of 99.0 wood units per hour. This unit will be constructed in 2004.

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

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

- (a) Natural gas-fired combustion sources with heat input less than ten million (10,000,000) British thermal units per hour [326 IAC 6-2-3]:
 - (1) One (1) natural gas-fired boiler, constructed in 1970, with a maximum capacity of 1.08 million British thermal units per hour, and exhausting to Stack ID#4; and

(2) One (1) natural gas-fired boiler, constructed in 1970, with a maximum capacity of 0.70 million British thermal units per hour, and exhausting to Stack ID#4; and

(b) Paved and unpaved roads with public access [326 IAC 6-4].

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Three (3) flow coaters, collectively identified as FC, all constructed in 1971, with a combined maximum capacity of 200 units per hour, and exhausting to Stack ID#1;
- (b) Two (2) lithographic printers, collectively identified as INK, both constructed in 1971, with a combined maximum capacity of 202 units per hour, and exhausting to Stack ID#3; and
- (c) One (1) paint booth with HVLP spray application, identified as PB, constructed in 1971, with a maximum capacity of 33 units per hour, with particulate emissions controlled by dry filters, and exhausting to Stack ID#2.
- (d) One (1) vacuum coater to apply water-borne coatings, identified as VC, with a maximum throughput rate of 600 wood units per hour. This unit will be constructed in 2004.
- (e) One (1) UV Finishing system, identified as UV, with a maximum throughput rate of 99.0 wood units per hour. This unit will be constructed in 2004.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets by the flow coaters (FC) and paint booth (PB) shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

Flow coating application is an accepted alternative method of application for roller coating. High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from the paint booth (PB) shall not exceed the pound per hour emission rate established as E in the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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

Pursuant to 326 IAC 6-3-2(d), particulate from the paint booth (PB) shall be controlled by a dry filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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 Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 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 Stack #2 while the booth is 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 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and a Part 70 Minor Permit Modification

Source Background and Description

Source Name:	By-Pass Paint Shop, Inc.
Source Location:	1132 North Nappanee Street, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	2499
Operation Permit No.:	T039-15592-00058
Operation Permit Issuance Date:	March 25, 2003
Minor Source Modification No.:	039-18700-00058
Minor Permit Modification No.:	039-18967-00058
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a modification application from By-Pass Paint Shop, Inc. relating to the construction of the following emission units and pollution control devices:

- (a) One (1) vacuum coater used to apply water-borne coatings, identified as VC, with a maximum throughput rate of 600 wood units per hour. This unit will be constructed in 2004.
- (b) One (1) UV Finishing system, identified as UV, with a maximum throughput rate of 99.0 wood units per hour. This unit will be constructed in 2004.

History

By-Pass Paint Shop, Inc. is an existing wood molding surface coating operation. A Part 70 permit (T039-15592-00058) was issued to this source on March 25, 2003. On March 23, 2004, the source submitted an application to the IDEM, OAQ requesting the construction of one (1) water borne coating line using a vacuum coater, and one (1) UV finishing line used in conjunction with the two (2) existing lithographic printers.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and the Part 70 Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on March 23, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 3).

Potential To Emit of Modification

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

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)
PM	0.00
PM10	0.00
SO ₂	0.00
VOC	17.3
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
Glycol Ether	7.76
TOTAL	7.76

Justification for Modification

This modification is being performed through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B)(iii) because the potential to emit of VOC from this modification is less than 25 tons per year and greater than 10 tons per year. The permit modification is being performed through a Part 70 Minor Permit Modification pursuant to 326 IAC 2-7-12(b) because this modification meets all the requirements in 326 IAC 2-7-12(b)(1).

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (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 for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Elkhart County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not in one of the 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	0.55
PM10	0.55
SO ₂	0.005
VOC	48.5
CO	0.64
NO _x	0.77
Total HAPs	38.7

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the potential to emit for the source as given in the TSD for the source's Title V permit (T039-15592-00058, issued March 25, 2003).

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Emission Units	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
PTE of Existing Units	0.55	0.55	0.01	48.5	0.64	0.77	38.7
New Units							
Vacuum Coater	0.74	0.74	0.00	6.20	0.00	0.00	6.65
UV Finishing System	0.00	0.00	0.00	11.1	0.00	0.00	0.11
Total PTE from Modification	0.74	0.74	0.00	17.3	0.00	0.00	7.76

Emission Units	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Total from Entire Source	1.29	1.29	0.01	65.8	0.64	0.77	46.5
PSD Thresholds	250	250	250	250	250	250	NA

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

Federal Rule Applicability

- (a) This modification does not involve a pollutant-specific emissions unit:
 - (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
 - (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) This modification is not subject to 40 CFR 63, Subpart JJ - National Emissions Standards for Hazardous Air Pollutants (NESHAPs) from Wood Furniture Manufacturing because this source does not manufacture wood furniture or wood furniture components.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Vacuum Coater, UV Finishing System

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The one (1) vacuum coater and one (1) UV finishing system are not subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because actual VOC emissions from each of these facilities are less than fifteen (15) pounds per day.

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

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the requirements from the previous version of 326 IAC 6-3 (Process Operations), which have been approved into the SIP, will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

- (a) The one (1) vacuum coater is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because it uses less than five (5) gallons of coating per day.

- (b) The one (1) UV finishing system is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because it does not have any particulate emissions.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The one (1) vacuum coater and one (1) UV finishing system are not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because each of these facilities do not have the potential emissions of VOC greater than twenty-five (25) tons per year.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There are no compliance monitoring requirements applicable to this modification.

Proposed Changes

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Three (3) flow coaters, collectively identified as FC, all constructed in 1971, with a combined maximum capacity of 200 units per hour, and exhausting to Stack ID#1;
- (b) Two (2) lithographic printers, collectively identified as INK, both constructed in 1971, with a combined maximum capacity of 202 units per hour, and exhausting to Stack ID#3; and
- (c) One (1) paint booth with HVLP spray application, identified as PB, constructed in 1971, with a maximum capacity of 33 units per hour, with particulate emissions controlled by dry filters, and exhausting to Stack ID#2.
- (d) **One (1) vacuum coater used to apply water-borne coatings, identified as VC, with a maximum throughput rate of 600 wood units per hour. This unit will be constructed in 2004.**
- (e) **One (1) UV Finishing system, identified as UV, with a maximum throughput rate of 99.0 wood units per hour. This unit will be constructed in 2004.**

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

- (a) Three (3) flow coaters, collectively identified as FC, all constructed in 1971, with a combined maximum capacity of 200 units per hour, and exhausting to Stack ID#1;
- (b) Two (2) lithographic printers, collectively identified as INK, both constructed in 1971, with a combined maximum capacity of 202 units per hour, and exhausting to Stack ID#3; and
- (c) One (1) paint booth with HVLP spray application, identified as PB, constructed in 1971, with a maximum capacity of 33 units per hour, with particulate emissions controlled by dry filters, and exhausting to Stack ID#2.
- (d) One (1) vacuum coater used to apply water-borne coatings, identified as VC, with a maximum throughput rate of 600 wood units per hour. This unit will be constructed in 2004.**
- (e) One (1) UV Finishing system, identified as UV, with a maximum throughput rate of 99.0 wood units per hour. This unit will be constructed in 2004.**

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

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 107-18700-00058 and the operation of this proposed modification shall be subject to the proposed Minor Permit Modification 039-18967-00058.

Appendix A: Emissions Calculations
VOC and PM/PM10
From Vacuum Coater and UV Finishing Facilities

Company Name: By-Pass Paint Shop, Incorporated
Address: 1132 North Nappanee Street, Elkhart, Indiana 46514
MPM to TV: 039-18700
Plt ID: 039-00058
Reviewer: ERG/SD
Date: May 18, 2004

Units	* Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Usage Rate (gal/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lb/hour)	PTE VOC (lb/day)	PTE VOC (tons/year)	PTE PM/PM10 (ton/year)	* Transfer Efficiency
Vacuum Coater	Marakesh (1)	8.78	86.6%	81.0%	5.6%	0.0%	8.90%	2.88	0.49	0.49	1.42	34	6.20	0.74	95%
UV Finishing	Aqualight Clear (2)	8.91	60.1%	0.0%	60.1%	0.0%	35.9%	0.48	5.35	5.35	2.54	61	11.1	0.00	100%
TOTAL											3.96	17.3	0.74		

Actual VOC Emissions (lbs/day) = 4.25 From Vacuum Coater
Actual VOC Emissions (lbs/day) = 7.63 From UV Finishing System

* Material 1 is applied on wood with a vacuum coater which is enclosed and has a transfer efficiency of 95 %.

* Material 2 is printed on wood and has a transfer efficiency of 100%.

METHODOLOGY

Pounds of VOC per gallon coating less water = Density (lb/gal) * Weight % Organics * 1/ (1-Volume % Water)

Pounds of VOC per gallon coating = Density (lb/gal) * Weight % Organics

PTE VOC (lb/hour) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour)

PTE VOC (lb/day) = Pounds of VOC per Gallon coating (lb/gal) * Max.Throughput (gal/hour) * 24 hour/day

PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE PM/PM10 (tons/year) = Max. Throughput (gal/hour) * Density (lb/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency) * 8760 hours/year * 1ton/2000 lbs

Actual VOC Emissions (lbs/day) = PTE (lbs/hour) * 750 hours/year * 1 year/250 days of operation

**Appendix A: Emissions Calculations
HAP Emissions
From Vacuum Coater and UV Finishing Facilities**

Company Name: By-Pass Paint Shop, Incorporated
Address: 1132 North Nappanee Street, Elkhart, Indiana 46514
MPM to TV: 039-18700
Pit ID: 039-00058
Reviewer: ERG/SD
Date: May 18, 2004

POTENTIAL TO EMIT OF HAPS

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	Weight % Gylcol Ether	PTE of Gylcol Ether (ton/year)
Marakesh (1)	8.78	2.88	6%	6.65
Aqualight Clear (2)	8.91	0.48	6%	1.11
TOTAL =				7.76

HIGHEST SINGLE HAP (Gylcol Ether) = 7.76 tons/year

METHODOLOGY

Potential To Emit HAPs (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Summary of Emissions**

Company Name: By-Pass Paint Shop, Incorporated
Address: 1132 North Nappanee Street, Elkhart, Indiana 46514
MPM to TV: 039-18700
Plt ID: 039-00058
Reviewer: ERG/SD
Date: May 18, 2004

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Unit	PM	PM10	SO2	NOx	VOC	CO	Total HAPs
Vacuum Coater and UV Finishing System	0.74	0.74			17.3		7.76
Total After Modification	0.74	0.74	0.00	0.00	17.3	0.00	7.76
Total from Existing Source	0.55	0.55	0.01	0.77	48.5	0.64	38.7
Total From Entire Source After Modification	1.29	1.29	0.01	0.77	65.8	0.64	46.5

* Glycol Ether