



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

April 27, 2004

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

TO: Interested Parties / Applicant

RE: Kimball Industrial Complex / 037-18708-001000

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

### Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

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

April 27, 2004

Ms. Gayle Pahmeier  
Kimball Industrial Complex  
flexcel – Jasper 15<sup>th</sup> Street  
1600 Royal Street  
Jasper, Indiana 47549

Re: Exempt Construction and Operation Status,  
037-18708-00100

Dear Ms. Pahmeier:

The application from the Kimball Industrial Complex, flexcel – Jasper 15<sup>th</sup> Street, received on March 22, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following proposed changes located at 1037 East 15<sup>th</sup> Street, Jasper, Indiana 47547 are classified as exempt from air pollution permit requirements:

- (a) Construction of two (2) natural gas-fired air make-up units, constructed in 2004, each with a maximum heat input rate of 1.3 MMBtu/hr.
- (b) Replacement of (1) conventional spray booth with one (1) down draft booth, identified as SB9.
- (c) Construction of one (1) non-spraying sidedraft flash tunnel, constructed in 2004.

The following conditions shall be applicable:

- (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:
  - (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 15 minutes (60 readings) in a 6-hour period 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.

This existing source submitted their Part 70 application (T037-7356-00100) on December 4, 1996. The equipment being reviewed under this exemption shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

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

ERG/YC

cc: File - Dubois County  
Dubois County Health Department  
Air Compliance – Gene Kelso  
Southwest Regional Office  
Permit Tracking – Sara Cloe  
Compliance Data Section  
Part 70 Application File – T037-7356-00100  
Part 70 Permit Reviewer – Melissa Groch

**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD) for an Exemption

**Source Background and Description**

Source Name:	Kimball Industrial Complex, flexcel – Jasper 15 <sup>th</sup> Street
Source Location:	1037 East 15 <sup>th</sup> Street, Jasper, Indiana 47547
County:	Dubois
SIC Code:	2542, 2541, 3499
Operation Permit No.:	T037-7356-00100
Operation Permit Issuance Date:	Pending
Exemption No.:	037-18708-00100
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from the Kimball Industrial Complex, flexcel – Jasper 15<sup>th</sup> Street relating to the following changes:

- (a) Construction of two (2) natural gas-fired air make-up units, constructed in 2004, each with a maximum heat input rate of 1.3 MMBtu/hr.
- (b) Replacement of (1) conventional spray booth with one (1) down draft booth, identified as SB9.
- (c) Construction of one (1) non-spraying sidedraft flash tunnel, constructed in 2004.

**History**

On March 22, 2004, Kimball Industrial Complex submitted an application to the OAQ requesting permission to replace the existing conventional spray booth (SB9) with a downdraft booth without replacing the existing spray guns at flexcel - Jasper 15th Street (Plant ID #037-00046). A non-spraying flash tunnel and two (2) natural gas fired air make-up units will also be added to this plant.

flexcel - Jasper 15th Street plant is part of the Kimball Industrial Complex (Plant ID #037-00100) which consists of several plants. Kimball Industrial Complex submitted a Part 70 permit application on December 4, 1996 and their Part 70 permit is currently being drafted.

Since the source will use the existing spray guns for booth SB9, the replacement of this booth is not considered a replacement of the entire emission unit and will not affect the potential to emit (PTE) VOC and HAPs from spray booth SB9. The additional flash tunnel, which has no spray coating operations and will be constructed next to spray booth SB9, is used to protect the wet finish prior to reaching the next spray booth. Therefore, the new flash tunnel will not increase the PTE of this source because the PTE was calculated based on the assumption that all the VOC and HAP were emitted from the surface coating booths only. The PTE of the new air make-up units is less than the exemption thresholds in 326 IAC 2-1.1-3(e). Therefore, these changes are exempt from permitting requirements.

### Enforcement Issue

There are no enforcement actions pending on the units listed in this exemption.

### 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 March 22, 2004. Additional information was received on April 12, 2004.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, page 1).

### Potential to Emit 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	0.09
PM-10	0.09
SO <sub>2</sub>	0.01
VOC	0.06
CO	0.96
NO <sub>x</sub>	1.14

HAPs	Potential to Emit (tons/yr)
Total	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of pollutants is less than the levels listed in 326 IAC 2-1.1-3(d)(1), therefore, these modifications are subject to the provisions of 326 IAC 2-1.1-3.
- (b) Fugitive Emissions  
Since this type of operation is not in 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 applicability.

### County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	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. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Dubois County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions  
 Since this type of operation is not 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 particulate matter (PM) and Volatile Organic Compound (VOC) emissions are not counted toward determination of PSD applicability.

**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	3.0
PM-10	3.0
SO <sub>2</sub>	1.0
VOC	414
CO	89
NO <sub>x</sub>	12
Single HAP	Greater than 10
Combination HAPs	Greater than 25

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions are based upon actual emissions in 2001 from IDEM's emission inventory, and are the total emissions from the Kimball Industrial Complex (Plant ID #037-00100), which includes flexcel - Jasper 15<sup>th</sup> Street (Plant ID #037-00046).

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This existing source submitted their Part 70 (T037-7356-00100) application on December 4, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this exemption.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this exemption.

### **State Rule Applicability – Two (2) Natural Gas Fired Air Make-Up Units**

#### 326 IAC 5-1 (Opacity Limitations)

This source is located in Dubois County, but it is not located in Bainbridge Township. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

### **Conclusion**

The construction and operation of this new spray booth and the side draft flash tunnel shall be subject to the conditions of the Exemption No.: 037-18708-00100.

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)  
From Two 1.3 MMBtu/hr Air Make-up Units**

**Company Name: Kimball Industrial Complex, flexcel - Jasper 15th Street  
Address: 1037 East 15th St., Jasper, IN 47547  
Exemption: 037-18708-00100  
Reviewer: ERG/YC  
Date: April 20, 2004**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2.6
-----

22.8

	Pollutant					
	PM*	PM10*	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
Emission Factor in lbs/MMCF	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.09</b>	<b>0.09</b>	<b>0.01</b>	<b>1.14</b>	<b>0.06</b>	<b>0.96</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100 lbs/MMCF.

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

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

**Methodology**

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

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs