



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 22, 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: Elite Enterprises, Inc / 003-18766-00205

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 9/16/03



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October 22, 2004

Mr. Gregg David
Elite Enterprises, Inc.
2701 South Coliseum Boulevard
Fort Wayne, Indiana 46803

Re: 003-18766-00205
Second Significant Source Modification to
Part 70 Permit No.: T003-7588-00205

Dear Mr. David:

Elite Enterprises, Inc. was issued a Part 70 Operating Permit T003-7588-00205 on September 3, 1999 for a stationary metal and plastic surface coating operation. An application to modify the source was received on April 5, 2004. Pursuant to the provisions of 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

Plant 2 (Creative Coatings, Inc.)

- (a) One (1) overhead conveyor paint line consisting of the following equipment:
 - (1) Five (5) stage water wash unit (identified as WW 1 through 5)
 - (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour.
 - (3) Five (5) paint booths (identified as PB5 through PB9), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB5 through PB9.
- (b) One (1) floor conveyor paint line consisting of the following equipment:
 - (1) One (1) paint booth (identified as PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stacks PB10A and 10B.
 - (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.
- (c) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. 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.

This proposed significant source modification approval shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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 Sanobar Durrani, ERG, 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, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/SD

cc: File - Allen County
Allen County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner
Title V Renewal Reviewer - ERG/SD



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Elite Enterprises, Inc.
2701 South Coliseum Boulevard
Suite 1158
Fort Wayne, Indiana 46803**

(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.: T003-7588-00205	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 3, 1999 Expiration Date: September 3, 2004

First Significant Source Modification No.: 003-16500-00205, issued January 23, 2004
First Significant Permit Modification No.: 003-17491-00205, issued February 29, 2004

Second Significant Source Modification 003-18766-00205	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 22, 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)]

The Permittee owns and operates a stationary metal and plastic surface coating operation for transportation (automotive and trucking), medical, consumer, and building industries.

Responsible Official: Michael R. Kreps
Source Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Phone Number: (219) 420-1605
SIC Code: 3479, 3089
County Location: Allen
County Status: Nonattainment for Ozone under the 8-hour Standard
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules
Major Source, under Nonattainment NSR
Major Source, Section 112 of the Clean 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:

Plant 1 (Elite Enterprises, Inc.)

- (a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fan, with a maximum capacity of one of the following:
- (1) 280 plastic large end caps per hour;
 - (2) 280 plastic air deflectors per hour;
 - (3) 140 plastic door trim parts per hour;
 - (4) 420 miscellaneous metal parts per hour

All paint booths listed are each equipped with either a high volume low pressure (HVLP) spray gun applications or an electrostatic spray equipment and water wash filtration for particulate matter control and each exhausting through one (1) stack, ID #'s PB-1 through PB-4, respectively.

Plant 2 (Creative Coatings, Inc.)

- (b) One (1) overhead conveyor paint line consisting of the following equipment:
- (1) Five (5) stage water wash unit (identified as WW 1 through 5), exhausting inside the building.

- (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour, and exhausting inside the building.
 - (3) Five (5) paint booths (identified as PB5 through PB9), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB5 through PB9.
- (c) One (1) floor conveyor paint line consisting of the following equipment:
- (1) One (1) paint booth (identified as PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stacks PB10A and 10B.
 - (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.
- (d) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

Plant 1 (Elite Enterprises, Inc.)

- (a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fan, with a maximum capacity of one of the following:
- (1) 280 plastic large end caps per hour;
 - (2) 280 plastic air deflectors per hour;
 - (3) 140 plastic door trim parts per hour;
 - (4) 420 miscellaneous metal parts per hour

All paint booths listed are each equipped with either a high volume low pressure (HVLP) spray gun applications or an electrostatic spray equipment and water wash filtration for particulate matter control and each exhausting through one (1) stack, ID #'s PB-1 through PB-4, respectively.

(The information describing this 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 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after August 18, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.2398]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M MMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M MMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart M MMM.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.1.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P PPP] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart P PPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after August 22, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart P PPP:
 - (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 003-8519-00205, issued on October 22, 1997, BACT for the four (4) paint booths (PB1 - PB4) for the coating of plastic parts shall be as follows:

- (a) high volume low pressure (HVLP) spray equipment shall be used for all first coat applications,
- (b) either HVLP or electrostatic equipment shall be used for second coat applications,
- (c) application of coating to a substrate by means of HVLP spray equipment shall operate 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, and
- (d) a test gauge air cap and air cap assembly shall be utilized on the HVLP spray equipment and recorded weekly.
- (e) the VOC content of the coatings as applied to the plastic parts shall not exceed the following limits:
 - (1) 5.8 lb VOC per gallon of coating, minus water for topcoats, and
 - (2) 3.7 lb VOC per gallon of coating, minus water for prime coats.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths which coats metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried Coat	3.5
Extreme Performance Coat	3.5
All Other Coat	3.0

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

D.1.7 PSD Minor Limit [326 IAC 2-2]

Pursuant to the requirement from CP-003-8519-00205, issued on October 22, 1997 and modified in Significant Source Modification 003-16500-00205, the VOC usage including coatings, dilution solvents, and cleaning solvents at the four (4) paint booths shall be limited to less than 250 tons of VOC per 12 consecutive month period, with compliance demonstrated at the end of each month. This usage limit is required to limit the source wide potential to emit of

VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.8 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP-003-8519-00205, issued on October 22, 1997 and 40 CFR 52 Subpart P, the PM from the four (4) paint booths (PB1 - PB4) shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

D.1.9 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP-003-8519-00205, issued on October 22, 1997 and 326 IAC 6-3-2(d), particulate from the four (4) paint booths (PB1 - PB4) shall each be controlled by a waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.10 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 Determination Requirements

D.1.11 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.1.1, D.1.2, and D.1.3 and the PM limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.12 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC content limit in conditions D.1.1(b) and D.1.2 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.

(b) Compliance with the VOC content and usage limitations contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.13 Monitoring

- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (PB-1 through PB-4) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.14 Record Keeping Requirements

- (a) To document compliance with conditions D.1.5 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.1.5 and D.1.6.
 - (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.
 - (6) A record of the test gauge air pressure utilized on the HVLP spray equipment for each week.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.7.
 - (1) The amount of coating material and solvent used on monthly 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.
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.1.13, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.16 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart Pppp, whichever is later. (For an existing affected source) the Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Pppp. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required

under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.17 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart Mmmm and Subpart Pppp, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart Mmmm and Subpart Pppp.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.1.18 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

Plant 2 (Creative Coatings, Inc.)

- (b) One (1) overhead conveyor paint line consisting of the following equipment:
- (1) Five (5) stage water wash unit (identified as WW 1 through 5), exhausting inside the building.
 - (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour, and exhausting inside the building.
 - (3) Five (5) paint booths (identified as PB5 through PB9), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB 5 through PB9.
- (c) One (1) floor conveyor paint line consisting of the following equipment:
- (1) One (1) paint booth (identified as PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stacks PB10A and 10B.
 - (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.
- (d) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

(The information describing this 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.2.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart Mmmm] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart Mmmm. The Permittee must comply with these requirements on and after August 18, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart Pppp] [40 CFR 63.2398]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart Pppp. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart Mmmm] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart Mmmm (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.2.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart Pppp] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart Pppp (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after August 22, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart Pppp:
 - (1) All coating operations as defined in 40 CFR 63.4581;

- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-1.1-5]

- (a) The amount of VOC in coatings, dilution solvents, and clean-up solvents used in the overhead conveyor paint line when painting plastic parts shall be limited to less than twenty-three (23) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The amount of VOC in coatings, dilution solvents, and clean-up solvents used in the floor conveyor paint line when painting plastic parts shall be limited to less than sixteen (16) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths which coats metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried Coat	3.5
Extreme Performance Coat	3.5
All Other Coat	3.0

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

D.2.7 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the overhead conveyor paint line and floor conveyor paint line shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

D.2.8 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the overhead conveyor paint line and floor conveyor paint line shall each be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.9 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 Determination Requirements

D.2.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC content limit in Condition D.2.6 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.

- (b) Compliance with the VOC content and usage limitations contained in Conditions D.2.5 and D.2.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the six (6) paint booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.5 and D.2.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.2.5 and D.2.6.
- (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.
 - (6) A record of the test gauge air pressure utilized on the HVLP spray equipment for each week.
- (b) To document compliance with Condition D.2.11, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.13 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.2.14 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR

63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) the Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.2.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM and Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM and Subpart PPPP.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.2.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

Part 70 Quarterly Report

Source Name: Elite Enterprises, Inc.
Source Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-7588-00205
Facility: Overhead conveyor paint line
Parameter: Volatile Organic Compounds (VOC)
Limit: The overhead conveyor paint line shall use less than 23 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance demonstrated at the end of each month.

Month	VOC Usage	VOC Usage	VOC Usage
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

Part 70 Quarterly Report

Source Name: Elite Enterprises, Inc.
Source Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-7588-00205
Facility: Floor conveyor paint line
Parameter: Volatile Organic Compounds (VOC)
Limit: The floor conveyor paint line shall use less than 16 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance demonstrated at the end of each month.

Month	VOC Usage	VOC Usage	VOC Usage
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Elite Enterprises, Inc.
Source Location:	2701 South Coliseum Boulevard, Fort Wayne, Indiana 46803
County:	Allen
SIC Code:	3479, 3089
Operation Permit No.:	T003-7588-00205
Operation Permit Issuance Date:	September 3, 1999
Significant Source Modification No.:	T003-18766-00205
Significant Permit Modification No.:	T003-19780-00205
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a modification application from Elite Enterprises, Inc. relating to the construction and operation of the following emission units:

Plant 2 (Creative Coatings, Inc.)

- (a) One (1) overhead conveyor paint line consisting of the following equipment:
- (1) Five (5) stage water wash unit (identified as WW 1 through 5), exhausting inside the building.
 - (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour, and exhausting inside the building.
 - (3) Five (5) paint booths (identified as PB5 through PB9), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB5 through PB9.
- (b) One (1) floor conveyor paint line consisting of the following equipment:
- (1) One (1) paint booth (identified as PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stacks PB10A and 10B.
 - (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.

- (c) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

History

On April 5, 2004 Creative Coating, Inc. submitted a MSOP application to IDEM, OAQ requesting to operate two surface coating lines, consisting of a total of six (6) paint booths that they took over from Elite Enterprises on March 31, 2004. The two sources are owned by the same parent company, are located in one building, and operate under the same SIC code (3479). Therefore, IDEM, OAQ has determined the two sources are co-located.

Elite Enterprises, Inc. is currently operating under TV permit no. 003-7588-00205, issued September 3, 1999. A significant permit modification to the TV (No. 003-17491-00205, issued February 4, 2004) removed five (5) paint booths of the original nine (9) from the source's permit. Although these five (5) paint booths were simply shut down and not used, they are still considered as new construction for the purpose of rule applicability. The sixth paint booth (identified as PB 11A and 11B) used in conjunction with the floor conveyor paint line has been operating without a valid permit.

Source Definition

This metal and plastic surface coating company consists of two (2) plants:

Plant 1 (Elite Enterprises, Inc.) and Plant 2 (Creative Coatings, Inc.), both located at 2701 South Coliseum Boulevard, Fort Wayne, Indiana 46803. The source location has been subdivided into smaller unit operations and have been assigned a unique suite number:

- (a) Creative Coatings, Inc. -- Suite 1284; and
- (b) Elite Enterprises, Inc. -- Suite 1158.

Since the two (2) plants are located in the same building, have the same SIC codes and are owned by the same parent company, IDEM, OAQ has determined the two (2) plants are one (1) source.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Each of PB5 through PB8	Paint Booths	36	34 inches	8,200	Ambient
PB10A and 10B	Paint Booth	36	2 feet	7,300	Ambient
PB9	Paint Booth	36	34 inches	7,300	Ambient
BO2	Bake Oven	15	1.5 feet	1,200	180°F

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and the Part 70 Significant 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 April 5, 2004. Additional information was received on July 27 and July 28, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1 of 6).

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	21.1
PM10	21.1
SO ₂	0.07
VOC	64.7
CO	1.04
NO _x	1.24

HAPs	Potential To Emit (tons/year)
Xylene	6.13
Toluene	5.29
Ethylbenzene	0.52
Formaldehyde	0.01
TOTAL	12.0

Justification for Modification

This Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. The permit modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(d) because the potential to emit of VOC is greater than 25 tons per year. The permit modification is being performed through a Part 70 Significant Permit Modification pursuant to 326 IAC 2-7-12(d) because the modification requires a case-by-case determination of an emission limit.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1- hour Ozone	Attainment
8- hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Allen County has been classified as attainment in Indiana 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 applicability.

Source Status

Existing Source 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	Less than 100
PM10	Less than 100
SO ₂	Less than 100
VOC	Greater than 100 Less than 250
CO	Less than 100
NOx	Less than 100

- (a) This existing source is a major stationary source under Nonattainment New Source Review (326 IAC 2-1.1-5) because a nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (b) This existing source is a minor stationary source under PSD (326 IAC 2-2) because all other attainment regulated pollutants are emitted less than 250 tons per year, and it is not in one of the 28 listed source categories.
- (c) These emissions are based upon the Technical Support Document (TSD) for SSM #003-16500-00205, issued on January 23, 2004.

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 Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
** Four (4) Paint Booths (PB1 through 4)	1.69	1.69	0.0	Less than 250	0.0	0.0	Greater than 10 and 25 for single and combination HAPs, respectively
Overhead Conveyor Paint Line	17.4	17.4		Less than 23			12.0
Floor Conveyor Paint Line	3.60	3.60		Less than 16.0			
Natural Gas Combustion Units	0.09	0.09	0.07	0.01	1.04	1.24	Negligible
Total Emissions from Modification	21.1	21.1	-	39.0	1.04	1.24	12.0
Total Emissions from the Entire Source	22.8	22.8	0.07	** Less than 250	1.04	1.24	Greater than 10 and 25 for single and combination HAPs, respectively
Nonattainment New Source Review Threshold	**250	*250	*250	40	*250	40	

* Threshold under 326 IAC 2-2 (PSD).

** After control emissions for paint booths (PB1 through PB4)

This modification to an existing major stationary source is not major because the emissions increase is less than the Nonattainment New Source Review significant levels for VOC and NO_x, and less than PSD significant levels for all other criteria pollutants. Therefore, pursuant to 326 IAC 2-1.1-5 and 326 IAC 2-2, the Nonattainment New Source Review and PSD requirements do not apply.

Federal Rule Applicability

- (a) This significant 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) included in this proposed modification.

- (c) This source is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS because the source does not perform any metal coil coating operation.
- (d) The overhead conveyor paint line and floor conveyor paint line are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR Part 63, Subpart MMMM and the source shall conform with the requirements of this subpart as described in the permit because this source is a major source of HAPs
- (e) The overhead conveyor paint line and floor conveyor paint line are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts, 40 CFR Part 63, Subpart PPPP and this source shall conform with the requirements of this subpart as described in the permit because this source is a major source of HAPs.

State Rule Applicability - Entire Source

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

The source was constructed in 1997 and is not in one (1) of the twenty-eight (28) source categories. At the time of construction, the source was a major source of VOC under PSD. Creative Coatings, Inc., co-located with Elite Enterprises, Inc. took over two (2) surface coating lines related to the custom painting operation from the latter company in March, 2004. The Title V Permit No. 003-7588-00205, issued on September 3, 1999, identified Elite Enterprises, Inc., as a minor source of VOC under PSD because VOC emissions from the entire source were limited to less than 250 tons per year. However, as of June 15, 2004, Allen County has been re-designated as nonattainment under the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to 326 IAC 2-1.1-5 (Nonattainment NSR). This source is now a major source because the potential to emit of VOC is greater than one hundred (100) tons per year.

The potential to emit of NO_x is less than 100 tons per year and all other uncontrolled pollutants are less than 250 tons per year.

326 IAC 2-1.1-5 (Nonattainment New Source Review)

This source was constructed in 1997 and is located in Allen County. As of June 15, 2004, Allen County has been re-designated as nonattainment under the 8-hour ozone standard. This source is a major source because the potential to emit of VOC is greater than one hundred (100) tons per year. The potential to emit of NO_x is less than 100 tons per year.

However, the modification to this existing major source is not major for VOC because the Permittee requested to limit the potential to emit of VOC from the overhead conveyor paint line and floor conveyor paint line to less than 40 tons per year. Compliance with these limits renders the provisions of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable to the source.

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

This modification is not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) because it is subject to the requirements of 40 CFR 63, Subpart MMMM and 40 CFR Part 63, Subpart PPPP.

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 for sources 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.

State Rule Applicability - Overhead Conveyor Paint Line and Floorboard Conveyor Paint Line

Note: There are a total of six (6) paint booths used for surface coating on plastic and metal parts.

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

- (a) The potential VOC emissions from the overhead conveyor paint line, consisting of five (5) paint booths are greater than 25 tons per year. The Permittee has requested to limit the amount of VOC in coatings, dilution solvents, and clean-up solvents used in the overhead conveyor paint line when painting plastic parts to less than twenty-three (23) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (b) The Permittee has requested to limit the amount of VOC in coatings, dilution solvents, and clean-up solvents used in the floor conveyor paint line when painting plastic parts to less than sixteen (16) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

Compliance with these limits also renders the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

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

When painting metal parts, the overhead conveyor paint line and the floor conveyor paint line are subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the actual emissions of VOC from each of the two lines are greater than fifteen (15) pounds per day and the source's Standard Industrial Classification Code is one of the listed codes in this rule.

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

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, the two (2) paint lines are in compliance with this limit.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

This source is not subject to 326 IAC 8-2-2 because the paint booths do not surface coat automobile and light duty truck bodies. The booths are used to surface coats metal and plastic parts used in trucks, medical, and consumer industries.

326 IAC 6-3-2 (Process Operations)

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 following requirement(s) from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement(s) until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the overhead conveyor paint line and floor conveyor paint line 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:

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

Under the rule revision, particulate from the overhead conveyor line and floor conveyor line shall be controlled by a dry particulate filters at all times the overhead conveyor line and the floor conveyor line are in operation, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

State Rule Applicability - Parts Cleaning Process, Five (5) Stage Water Wash Unit

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

- (a) The one (1) parts cleaning process is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because this process uses less than five (5) gallons of material per day.
- (b) The five (5) stage water wash unit (identified as WW1 through WW5) is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because there are no particulate emissions generated from its operation.

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

- (a) The parts cleaning process is not subject to the provision of 326 IAC 8-3-1 (Organic Solvent Degreasing Operations) because the source hand wipes the plastic and metal parts prior to surface coating operations.
- (b) The five (5) stage water wash unit (identified as WW1 through WW5) is not subject to the requirements of 326 IAC 8-3-1 (Organic Solvent Degreasing Operations) because this unit does not employ the use of any organic solvent for degreasing.

State Rule Applicability - Bake Oven and Dry Off Oven

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

The natural gas-fired bake and dry off ovens are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes) because the particulate emissions from these units are from combustion only.

326 IAC 4-2 (Incinerators)

The natural gas-fired bake-off oven is not subject to 326 IAC 4-2 (Incinerators) because this unit does not burn solid waste, that is, refuse more than 50 % of which consists of a mixture of paper, wood, yard wastes, food wastes, plastics, etc. This unit helps to cure the paint applied in the floor conveyor paint line.

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.

The compliance monitoring requirements applicable to this modification are as below:

1. The overhead conveyor paint line and the floor conveyor paint line has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the six (6) paint booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry particulate filters for the overhead conveyor line and floor conveyor line must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 2-1.1-5 (Nonattainment - New Source Review).

Proposed Changes

Bold language has been added, language with a line through it has been deleted.

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

The Permittee owns and operates a stationary metal and plastic surface coating operation for transportation (automotive and trucking), medical, consumer, and building industries.

Responsible Official: Michael R. Kreps
Source Address: 2701 South Coliseum Boulevard, Suite 1158. Fort Wayne, IN 46803
Mailing Address: 2701 South Coliseum Boulevard, Suite 1158. Fort Wayne, IN 46803
Phone Number: (219) 420-1605
SIC Code: 3479, 3089
County Location: Allen
County Status: **Nonattainment for Ozone under the 8-hour Standard**
Attainment for all **other** criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, under Nonattainment NSR

Major Source, Section 112 of the Clean 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:

Plant 1 (Elite Enterprises, Inc.)

- (a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fan, with a maximum capacity of one of the following:
- (1) 280 plastic large end caps per hour;
 - (2) 280 plastic air deflectors per hour;
 - (3) 140 plastic door trim parts per hour;
 - (4) 420 miscellaneous metal parts per hour

All paint booths listed are each equipped with either a high volume low pressure (HVLP) spray gun applications or an electrostatic spray equipment and water wash filtration for particulate matter control and each exhausting through one (1) stack, ID #'s PB-1 through PB-4, respectively.

Plant 2 (Creative Coatings, Inc.)

- (b) One (1) overhead conveyor paint line consisting of the following equipment:

- (1) Five (5) stage water wash unit (identified as WW 1 through 5), exhausting inside the building.
- (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour, and exhausting inside the building.
- (3) Five (5) paint booths (identified as PB5 through PB9), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB5 through PB9.

- (c) One (1) floor conveyor paint line consisting of the following equipment:

- (1) One (1) paint booth (identified as PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stacks PB10A and 10B.
- (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.

- (d) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Plant 1 (Elite Enterprises, Inc.)

- (a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fan, with a maximum capacity of one of the following:
- (1) 280 plastic large end caps per hour;
 - (2) 280 plastic air deflectors per hour;
 - (3) 140 plastic door trim parts per hour;
 - (4) 420 miscellaneous metal parts per hour

All paint booths listed are each equipped with either a high volume low pressure (HVLP) spray gun applications or an electrostatic spray equipment and water wash filtration for particulate matter control and each exhausting through one (1) stack, ID #'s PB-1 through PB-4, respectively.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Plant 2 (Creative Coatings, Inc.)

- (b) One (1) overhead conveyor paint line consisting of the following equipment:
- (1) Five (5) stage water wash unit (identified as WW 1 through 5)
 - (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour.
 - (3) Five (5) paint booths (identified as PB5 through PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB 5 through PB10.
- (c) One (1) floor conveyor paint line consisting of the following equipment:
- (1) One (1) paint booth (identified as PB11A and 11B), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stack PB11.
 - (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.
- (d) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

(The information describing this 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.2.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after August 18, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.2.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after August 22, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
 - (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-1.1-5]

- (a) The amount of VOC in coatings, dilution solvents, and clean-up solvents used in the overhead conveyor paint line when painting plastic parts shall be limited to less than twenty-three (23) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The amount of VOC in coatings, dilution solvents, and clean-up solvents used in the floor conveyor paint line when painting plastic parts shall be limited to less than sixteen (16) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths which coats metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried Coat	3.5
Extreme Performance Coat	3.5
All Other Coat	3.0

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

D.2.7 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the overhead conveyor paint line and floor conveyor paint line shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

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

D.2.8 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the overhead conveyor paint line and floor conveyor paint line shall each be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.9 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 Determination Requirements

D.2.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC content limit in Condition D.2.6 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.

- (b) Compliance with the VOC content and usage limitations contained in Conditions D.2.5 and D.2.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the six (6) paint booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.5 and D.2.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.2.5 and D.2.6.
- (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.
- (6) A record of the test gauge air pressure utilized on the HVLP spray equipment for each week.
- (b) To document compliance with Condition D.2.11, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.13 Notification Requirements [40 CFR 63.3910]

- (a) **General.** The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) **Initial notification.** The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.2.14 Notification Requirements [40 CFR 63.4510]

- (a) **General.** The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) **Initial notification.** The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart Pppp, whichever is later. (For an existing affected source) the Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Pppp. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart Iiii of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The

notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.2.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart Mmmm and Subpart Pppp, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.**
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart Mmmm and Subpart Pppp.**
- (c) The significant permit modification application shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

D.2.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

Part 70 Quarterly Report

Source Name: Elite Enterprises, Inc.
Source Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-7588-00205
Facility: Overhead conveyor paint line
Parameter: Volatile Organic Compounds (VOC)
Limit: The overhead conveyor paint line shall use less than 23 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance demonstrated at the end of each month.

Month	VOC Usage	VOC Usage	VOC Usage
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

Part 70 Quarterly Report

Source Name: Elite Enterprises, Inc.
Source Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-7588-00205
Facility: Floor conveyor paint line
Parameter: Volatile Organic Compounds (VOC)
Limit: The floor conveyor paint line shall use less than 16 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance demonstrated at the end of each month.

Month	VOC Usage	VOC Usage	VOC Usage
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. In accordance with the credible evidence rule (62 Fed. Reg. 8314, February 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

B.27 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6] [62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

2. This source is located in Allen County and is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Therefore, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. IDEM, OAQ has updated Condition C.17 (Emission Statement) as shown below.

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- ~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~
- ~~(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
 - ~~(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.~~
- ~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~
- ~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~
- ~~(c) The annual emission statement 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.~~
- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);**

- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.**

The statement must be submitted to:

**Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, (and local agency when applicable) on or before the date it is due.**

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 003-18766-00205. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 003-19780-00205.

**Appendix A: Emission Calculations
Three (3) Natural Gas-Fired Ovens**

Company Name: Elite Enterprises, Inc.
Address: 2701 South Coliseum Boulevard, Suite 1284
SSM/SPM to TV: 003-18766 and 003-19780
Pit ID: 003-00331
Reviewer: ERG/SD
Date: July 12th, 2004

Heat Input Capacity
MMBtu/hour

Potential Throughput
MMCF/year

2.83 (3 Units only)

24.8

	Pollutant					
	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.09	0.09	0.01	1.2	0.07	1.04

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

**Emission factors for NO_x: Uncontrolled = 100 lb/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 (July, 1998).

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/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Three (3) Natural Gas-Fired Ovens

Company Name: Elite Enterprises, Inc.
Address: 2701 South Coliseum Boulevard, Suite 1284
SSM/SPM to TV: 003-18766 and 003-19780
Pit ID: 003-00331
Reviewer: ERG/SD
Date: July 12th, 2004

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	2.60E-05	1.49E-05	9.30E-04	2.23E-02	4.21E-05

TOTAL

2.33E-02

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	6.20E-06	1.36E-05	1.74E-05	4.71E-06	2.60E-05

TOTAL

6.79E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).

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

**Appendix A: Emissions Calculations
For Six (6) Paint Booths**

Company Name: Elite Enterprises, Inc.
Address: 2701 South Coliseum Boulevard, Suite 1284
SSM/SPM to TV: 003-18766 and 003-19780
Pit ID: 003-00331
Reviewer: ERG/SD
Date: July 12th, 2004

Emission Unit	Material	Density (lb/gal)	Weight % Volatile (H ₂ O & 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	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	* Transfer Efficiency
Overhear Conveyor Line	Gray Monocoat	8.89	48.5%	0.0%	48.5%	0.0%	40.6%	0.03300	75	4.31	4.31	10.7	256	46.8	17.4	65%
Floorboard Conveyor Line	AD Gray Cond Primer	8.72	61.2%	0.0%	61.2%	0.0%	23.7%	0.0330	21.0	5.33	5.33	3.70	88.7	16.2	3.60	65%
														62.9	21.0	

* All material applied by HVLP spray guns to plastic parts and controlled by dry particulate filters.
 Note: The clean up solvent used in the paint booths is acetone which is not a VOC.

Actual VOC Emissions From Paint Booths 1 through 5(lbs/day) = 85
 Actual VOC Emissions From Paint Booth 6(lbs/day) = 30

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 of VOC (lbs/hour) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour)
 PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 24 hours/day
 PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 8760 hours/year * 1 ton/2000 lbs
 PTE of PM/PM10 (tons/year) = Maximum (units/hour) * Gal of Material (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency) * 8760 hours/year * 1 ton/2000 lbs
 Actual VOC (lbs/day) = PTE (lbs/hour) * 1920 hours/year * 1year/240 days of operation

**Appendix A: Emission Calculations
For Six (6) Paint Booths**

Company Name: Elite Enterprises, Inc.
Address: 2701 South Coliseum Boulevard, Suite 1284
SSM/SPM to TV: 003-18766 and 003-19780
Pit ID: 003-00331
Reviewer: ERG/SD
Date: July 12th, 2004

Emission Unit	Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Formaldehyde	PTE of Xylene (ton/year)	PTE of Toluene (ton/year)	PTE of Ethylbenzene (ton/year)	PTE of Formaldehyde (ton/year)
Overhear Conveyor Line	Gray Monocoat	8.89	0.03300	75	4.99%		1.00%		4.81	0.00	0.22	
Floorboard Conveyor Line	AD Gray Cond Primer	8.72	0.0330	21	4.99%	20%	4.99%	0.04%	1.32	5.29	0.30	0.011
									6.13	5.29	0.52	0.01

Single Highest HAP (tons/year) = 6.13
Combination of HAPs (tons/year) = 12.0

METHODOLOGY

PTE of HAPS (tons/year) = Density (lb/gal) * Gal of Mat (gal/unit) * Maximum (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Parts Cleaning

Company Name: Elite Enterprises, Inc.
Address: 2701 South Coliseum Boulevard, Suite 1284
SSM/SPM to TV: 003-18766 and 003-19780
Pit ID: 003-00331
Reviewer: ERG/SD
Date: July 12th, 2004

Emission Unit	Density (lb/gal)	Maximum Usage Rate (gal/day)	PTE of VOC (tons/year)
Parts Cleaning	6.57	1.5	1.80

METHODOLOGY

PTE of VOC (tons/year) = Density (lb/gal) * Maximum Usage Rate (gal/day) * 365 days/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Summary**

Company Name: Elite Enterprises, Inc.
Address: 2701 South Coliseum Boulevard, Suite 1284
SSM/SPM to TV: 003-18766 and 003-19780
Pit ID: 003-00331
Reviewer: ERG/SD
Date: July 12th, 2004

POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR

Emission Units	PM	PM10	VOC	NOx	SO₂	CO	** Highest Single HAP	Total HAPs
Combustion	0.09	0.09	0.01	1.24	0.07	1.04		2.3E-02
Two (2) Paint Lines	21.0	21.0	62.9					
Parts Cleaning			1.80				6.13	12.0
TOTAL	21.1	21.1	64.7	1.24	0.07	1.04	6.13	12.0

** Xylene