



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: March, 11, 2005  
RE: Creative Coatings, Inc. / 003-18990-00297  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 1/10/05



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## MINOR SOURCE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Creative Coatings, Inc.**  
**7505 Freedom Way**  
**Fort Wayne, Indiana 46818**

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

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

Operation Permit No.: MSOP 003-18990-00297	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 11, 2005  Expiration Date: March 11, 2010



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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary plastic and metal parts coating plant.

Authorized Individual: President  
Source Address: 7505 Freedom Way, Fort Wayne, Indiana 46818  
Mailing Address: 7505 Freedom Way, Fort Wayne, Indiana 46818  
General Source Phone: (260) 489-3580  
SIC Code: 3479  
County Location: Allen  
Source Location Status: Nonattainment Area for Ozone under the 8-hour standard  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD and Nonattainment New Source Review  
Minor Source, Section 112 of the Clean Air Act  
Not in 1 of 28 Source Categories

### A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) metal parts powder coating facility, constructed in 1997 and consisting of:
  - (1) One (1) 0.95 MMBtu per hour natural gas-fired cure oven (identified as EU02) exhausting at stack 4;
  - (2) One (1) large and one (1) small closed powder coating booths (identified as EU03A and EU03B), both with a total maximum throughput rate of 208 pounds of coating material per hour and controlled by an integral cyclone/filter cartridge system, and exhausting inside the building;
  - (3) One (1) ancillary electric oven (identified as EU05) exhausting at stack 8; and
  - (4) One (1) 0.5 MMBtu per hour natural gas-fired gas oven (identified as EU06) exhausting to stack 8.
- (b) One (1) plastic parts surface coating spray booth (identified as EU07), using air assisted airless spray guns and equipped with a 0.559 MMBtu per hour natural gas-fired cure oven (identified as EU01), and exhausting at stack 5. The spray booth is controlled by dry filters and was constructed in 1998.
- (c) One (1) 0.5 MMBtu per hour natural gas-fired pyrolysis bake-off oven (identified as EU08), exhausting at stacks 6 and 7. This unit was installed in 1997.
- (d) Natural gas-fired combustion units consisting of:
  - (1) Three (3) 0.12 MMBtu per hour natural gas fired space heaters;
  - (2) One (1) 0.1 MMBtu per hour natural gas-fired space heater;
  - (3) One (1) 3.33 MMBtu per hour natural gas-fired air makeup unit (identified as

EU09); and

- (4) One (1) 0.003 MMBtu per hour natural gas-fired pretreatment power-washer (identified as EU01) using an inorganic solvent, and exhausting at stacks 1, 2, and 3.

## **SECTION B GENERAL CONDITIONS**

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

### **B.1 Permit No Defense [IC 13]**

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

### **B.2 Definitions**

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

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

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

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

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

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

### **B.5 Modification to Permit [326 IAC 2]**

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

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

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46204
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

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

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

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

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

### C.3 Opacity [326 IAC 5-1]

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

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

### C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

## Testing Requirements

### C.5 Performance Testing [326 IAC 3-6]

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

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

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

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.6 Compliance Requirements [326 IAC 2-1.1-11]**

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

### **Compliance Monitoring Requirements**

#### **C.7 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### **C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

#### **C.9 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]**

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- (a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( 2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a (temperature or flow rate), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( 2%) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

#### C.10 Compliance Response Plan - Preparation and Implementation

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is

operating, except for time necessary to perform quality assurance and maintenance activities.

## Record Keeping and Reporting Requirements

### C.11 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

### C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The

reports do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## EMISSIONS UNITS OPERATION CONDITIONS

### Facility Description:

- (b) One (1) plastic parts surface coating spray booth (identified as EU07), using air assisted airless spray guns and equipped with a 0.559 MMBtu per hour natural gas-fired cure oven (identified as EU01), and exhausting at stack 5. The spray booth is controlled by dry filters and was constructed in 1998.

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

### Emission Limitations and Standards

#### D.1.1 Hazardous Air Pollutants [326 IAC 2-7]

Any change or modification which would increase the potential to emit of any single HAP and combination of HAPS greater than ten (10) and twenty-five (25) tons per year, respectively, shall require prior approval from IDEM, OAQ.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The amount of VOC in coatings, dilution solvents, and clean-up solvents used in the plastic parts surface coating spray booth (identified as EU07) shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall render the requirements of 326 IAC 8-1-6 not applicable.

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

- (a) Particulate from the plastic parts surface coating spray booth (identified as EU07) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

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

### Compliance Determination Requirements

#### D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 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.

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

### **D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, 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 and HAP usage limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The cleanup solvent usage for each month;
  - (3) The total VOC and HAP usage for each month; and
  - (4) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3 the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.7 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

## SECTION D.2

## EMISSIONS UNITS OPERATION CONDITIONS

### Facility Description:

- (a) One (1) metal parts powder coating facilities, constructed in 1997 and consisting of:
- (1) One (1) 0.95 MMBtu per hour natural gas-fired cure oven (identified as EU02) exhausting at stack 4;
  - (2) One (1) large and one (1) small closed powder coating booths (identified as EU03A and EU03B), both with a total maximum throughput rate of 208 pounds per hour and controlled by an integral cyclone/filter cartridge system, and exhausting inside the building;
  - (3) One (1) ancillary electric oven (identified as EU05) exhausting at stack 8; and
  - (4) One (1) 0.5 MMBtu per hour natural gas-fired gas oven (identified as EU06) exhausting to stack 8.

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

### Emission Limitations and Standards

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the metal parts powder coating facilities shall not exceed 0.90 pounds per hour when operating at a process weight rate of 208 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 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

### Compliance Determination Requirements

#### D.2.2 Particulate Control

In order to comply with Condition D.2.1, the pneumatic cyclone/cartridge filter for particulate control shall be in operation and control emissions from the metal powder coating facilities at all times that the metal powder coating facilities are in operation.

### Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.2.3 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is

observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

## SECTION D.3

## EMISSIONS UNITS OPERATION CONDITIONS

### Facility Description:

- (c) One (1) 0.5 MMBtu per hour natural gas-fired pyrolysis bake-off oven (identified as EU08), exhausting at stacks 6 and 7. This unit was installed in 1997.

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

### Emission Limitations and Standards

#### D.3.1 Particulate [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2(Incinerators), the pyrolysis bake-off oven shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c);  
and
- (e) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators.

If any of the above requirements are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

## SECTION D.4

## EMISSIONS UNITS OPERATION CONDITIONS

### Facility Description:

- (d) Natural gas-fired combustion units consisting of:
- (1) Three (3) 0.12 MMBtu per hour natural gas fired space heaters;
  - (2) One (1) 0.1 MMBtu per hour natural gas-fired space heater;
  - (3) One (1) 3.33 MMBtu per hour natural gas-fired air makeup unit (identified as EU09);  
and
  - (4) One (1) 0.003 MMBtu per hour natural gas-fired pretreatment power-washer (identified as EU01) using an inorganic solvent, and exhausting at stacks 1, 2, and 3.

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

### Emission Limitations and Standards

There are no specifically applicable State or Federal rules applicable to these emission units.

## Indiana Department of Environmental Management Office of Air Quality Compliance Data Section

### Quarterly Report

Company Name: Creative Coatings, Inc.  
Location: 7505 Freedom Way, Fort Wayne, Indiana 46818  
Permit No.: 003-18990-00297  
Source: Plastic parts surface coating spray booth  
Pollutant: VOC  
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Year: \_\_\_\_\_

Month	Usage/Emissions (tons/month)

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	<b>Creative Coatings, Inc.</b>
<b>Address:</b>	<b>7505 Freedom Way</b>
<b>City:</b>	<b>Fort Wayne, Indiana 46818</b>
<b>Phone #</b>	<b>(260) 489-3580</b>
<b>MSOP #:</b>	<b>003-18990-00297</b>

I hereby certify that Creative Coatings, Inc. is  still in operation.  
 no longer in operation.

I hereby certify that Creative Coatings, Inc. is  in compliance with the requirements of MSOP 003-18990-00297  
 not in compliance with the requirements of MSOP 003-18990-00297

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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# Indiana Department of Environmental Management Office of Air Quality

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

### Source Background and Description

Source Name:	Creative Coatings, Inc.
Source Location:	7505 Freedom Way, Fort Wayne, Indiana 46818
County:	Allen
SIC Code:	3479
Operation Permit No.:	MSOP 003-10783-00297
Operation Permit Issuance Date:	August 16, 1999
Permit Renewal No.:	003-18990-00297
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from Creative Coatings, Inc. relating to the operation of a stationary plastic and metal surface coating operation for transportation, medical, consumer, and building industries.

### Source Definition

Creative Coatings, Inc. consists of two (2) plants:

- (a) Plant 1 is located at 7505 Freedom Way, Fort Wayne, Indiana 46818;
- (b) Plant 2 is located at 2701 South Coliseum Boulevard, Fort Wayne, Indiana 46803.

Although the two (2) plants have the same SIC codes and are owned by one (1) company, the distance between plant 1 and plant 2 is approximately 9.4 miles and there is no direct support facility relationship between the facilities. Therefore, IDEM, OAQ, has made a determination that the two (2) plants are considered as separate sources.

### Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) metal parts powder coating facility, constructed in 1997 and consisting of:
  - (1) One (1) 0.95 MMBtu per hour natural gas-fired cure oven (identified as EU02) exhausting at stack 4;
  - (2) One (1) large and one (1) small closed powder coating booths (identified as EU03A and EU03B), both with a total maximum throughput rate of 208 pounds of coating material per hour and controlled by an integral cyclone/filter cartridge system, and exhausting inside the building;
  - (3) One (1) ancillary electric oven (identified as EU05) exhausting at stack 8; and
  - (4) One (1) 0.5 MMBtu per hour natural gas-fired gas oven (identified as EU06) exhausting at stack 8.

These units were all constructed in 1997.

- (b) One (1) plastic parts surface coating spray booth (identified as EU07), using air assisted airless spray guns and equipped with a 0.559 MMBtu per hour natural gas-fired cure oven (identified as EU01) and exhausting at stack 5. The spray booth is controlled by dry filters and was constructed in 1998.
- (c) One (1) 0.5 MMBtu per hour natural gas-fired pyrolysis bake-off oven (identified as EU08), exhausting at stacks 6 and 7. This unit was installed in 1997.
- (d) Natural gas-fired combustion units consisting of:
  - (1) Three (3) 0.12 MMBtu per hour natural gas fired space heaters;
  - (2) One (1) 0.1 MMBtu per hour natural gas-fired space heater;
  - (3) One (1) 3.33 MMBtu per hour natural gas-fired air makeup unit (identified as EU09); and
  - (4) One (1) 0.003 MMBtu per hour natural gas-fired pretreatment power-washer (identified as EU01) using an inorganic solvent, and exhausting at stacks 1, 2, and 3.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **Existing Approvals**

The source has been operating under MSOP 003-10783-00297, issued on August 16, 1999. All conditions from this approval were incorporated into this permit.

### **Air Pollution Control Justification as an Integral Part of the Process**

Pursuant to MSOP No.: 003-10783-00297, issued August 16, 1999, the pneumatically conveyed cyclone/filter cartridge system used in conjunction with the two (2) powder coating booths has been determined by IDEM, OAQ to be integral to the process. These controls recycle and recover 97% of the fugitive powder (PM/PM10) lost when powder coating. Therefore, the permitting level will be determined using the potential to emit after the cyclone/filter cartridge system. Operating conditions in the proposed permit will specify that this cyclone/filter cartridge system shall operate at all times when the powder coating booths are in operation.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

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

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

An application for the purposes of this review was received on April 28, 2004, with additional information received on August 17, 2004, and August 24, 2004.

## Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 8)

## Potential to Emit of the Revision Before Controls

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

Pollutant	Potential to Emit (tons/year)
PM	20.0
PM10	20.0
SO <sub>2</sub>	0.15
VOC	26.8
CO	2.32
NO <sub>x</sub>	2.76

HAPs	Potential to Emit (tons/year)
Ethyl Benzene	0.71
Styrene	0.10
Xylene	4.25
A-Butyl Acetate	6.69
Methyl Isobutyl Ketone	2.17
Hexamethylene Di-Isocyanate	0.10
Methyl Ethyl Ketone (MEK)	5.22
Toluene	2.89
N-Butyl Alcohol	0.27
Total	22.5

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment

Pollutant	Status
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 one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Source Status**

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

Pollutant	Emissions (tons/year)
PM	20.0
PM10	20.0
SO <sub>2</sub>	0.15
VOC	26.8
CO	2.32
NO <sub>x</sub>	2.76
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater.
- (b) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater, and it is not in one (1) of the twenty-eight (28) listed source categories.
- (c) These emissions were based on the potential to emit calculations for the source as shown in Appendix A.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This is the second air approval issued to this source.

### **Federal Rule Applicability**

- (a) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart SS – Standards of Performance for Industrial Surface Coating: Large Appliances (326 IAC 12) is not applicable because it does not surface coat large appliances as defined in 40 CFR 60.451(a). It surface coats plastic and metal parts used in transportation, medical, consumer, and building industries.
- (b) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart TT – Standards of Performance for Metal Coil Surface Coating (326 IAC 12) is not applicable to the source because it does not perform any metal coil surface coating operation. It surface coats plastic and metal parts used in transportation, medical, consumer, and building industries.
- (c) The requirements of the New Source Performance Standard, 40 CFR 60, Subpart TTT– Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines is not applicable to the source because it does not surface coat business machines as defined in 40 CFR 60.721(a). It surface coats plastic and metal parts used in transportation, medical, consumer, and building industries.
- (d) The requirements of National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS are not applicable to this source. The source does not perform any metal coil coating operation and is not a major source of HAPs.
- (e) 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 are not applicable to this source. The source powder coats the metal parts and is not a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts, 40 CFR Part 63, Subpart PPPP are not applicable to the source. The source is not a major source of HAPs.
- (g) The requirement of the National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning, 40 CFR Part 63, Subpart T are not applicable to the source because it uses a non-halogenated solvent in the power washer facility.

### **State Rule Applicability – Entire Source**

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

The source, located in Allen County, was constructed in 1997/1998 and is not in one (1) of the twenty-eight (28) source categories. At construction the source was a minor source under PSD because the potential to emit of PM and all criteria pollutants from the entire source were less than 250 tons per year. As of June 15, 2004, Allen County has been re-designated as nonattainment under the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions are now being reviewed under the provision of 326 IAC 2-1.1-5 (Nonattainment New Source Review). There have been no modifications at the source since construction and the potential to emit of PM, PM<sub>10</sub>, SO<sub>2</sub> and CO from the entire source continues to be less than 250 tons per year. Therefore, this source is a minor source under PSD and the initial construction of this source was not subject to the provisions of 326 IAC 2-2 (PSD).

#### **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 designated as nonattainment under the 8-hour ozone standard. This source is a minor source because the potential to emit of VOC and NO<sub>x</sub> is less than one hundred (100) tons per year. Therefore, the provisions of 326 IAC 2-1.1-5 (Nonattainment New Source Review) are not applicable to the source.

**326 IAC 2-6 (Emission Reporting)**

This source is not required to operate pursuant to the provisions of 326 IAC 2-7 (Part 70 Permit) and it is not located in Lake or Porter Counties. Therefore, the provisions of 326 IAC 2-6 (Emission Reporting) are not applicable to the source.

**326 IAC 2-7 (Part 70 Program)**

Any change or modification which would increase the potential to emit of any single HAP or combination of HAPs to greater than ten (10) and twenty-five (25) tons per year, respectively, shall require prior approval from IDEM, OAQ.

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

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

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

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

Although constructed after July 27, 1997, the applicability date for this rule, the operation of this stationary plastic and metal parts coating plant emits less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**State Rule Applicability - Metal Powder Coating Facility**

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

Pursuant to MSOP No. 003-10783-00297, issued on August 16, 1999, the particulate from the metal powder coating booths shall not exceed 0.90 pounds per hour when operating at a process weight of 208 pounds per hour.

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

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

The pneumatic cyclone/filter cartridge system shall be in operation at all times the metal powder coating booths are in operation, in order to comply with this limit.

**State Rule Applicability - Plastic Parts Surface Coating Spray Booth**

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

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) particulate from the plastic parts surface coating spray booth (identified as EU07) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

This surface coating booth was constructed after January 1, 1980, the applicability date for this rule, and the potential VOC emissions from the plastic parts surface coating spray booth (identified as EU07) is greater than twenty-five (25) tons per year. Pursuant to MSOP No. 003-10783-00297, issued August 16, 1999, the Permittee has requested to continue to limit the amount of VOC in coatings, dilution solvents, and clean-up solvents used in the plastic parts surface coating spray booth (identified as EU07) to less than twenty-five (25) 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.

**State Rule Applicability - Pyrolysis Bake-off Oven**

**326 IAC 4-2-2 (Incinerators)**

Pursuant to MSOP No.: 003-10783-00297, issued on August 16, 1999, the pyrolysis bake-off oven, which is used for cleaning fixtures used in the powder coat system is subject to the provisions of 326 IAC 4-2-2 (Incinerators). Pursuant to this rule, the pyrolysis bake-off oven shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (e) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air.

If any of the above requirements are not met, the Permittee shall stop charging the pyrolysis bake-off oven until adjustments are made that address the underlying cause of the deviation.

**State Rule Applicability – Power Washer**

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

The power washer facility is not subject to the provisions of 326 IAC 8-3 Organic Solvent Degreasing Operations) because this facility uses only inorganic solvents in this process.

**State Rule Applicability - Natural Gas-Fired Combustion Units**

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

The natural gas-fired combustion units (other than boilers and process heaters) are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the particulate emissions from these units are from combustion only.

**Conclusion**

The operation of this stationary plastic and metal parts coating plant shall be subject to the conditions of the Minor Source Operating Permit 003-18990-00297.

**Appendix A: Emission Calculations  
Six (6) Natural Gas-Fired Units**

**Company Name:** Creative Coatings, Inc.  
**Address:** 17505 Freedom Way, Fort Wayne, Indiana 46818  
**MSOP Renewal:** 003-18990  
**Pit ID:** 003-00297  
**Reviewer:** ERG/SD  
**Date:** July 26th, 2004

Heat Input Capacity  
MMBtu/hour

Potential Throughput  
MMCF/year

3.79 (6 Units Total)

33.2

	<b>Pollutant</b>					
	* PM	* PM10	SO <sub>2</sub>	** NO <sub>x</sub>	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.13	0.13	0.01	1.66	0.09	1.40

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

\*\*Emission factor for NO<sub>x</sub>: 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  
Six (6) Natural Gas-Fired Units**

**Company Name:** Creative Coatings, Inc.  
**Address:** 17505 Freedom Way, Fort Wayne, Indiana 46818  
**MSOP Renewal:** 003-18990  
**Pit ID:** 003-00297  
**Reviewer:** ERG/SD  
**Date:** July 26th, 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)	3.49E-05	1.99E-05	1.25E-03	2.99E-02	5.65E-05

**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)	8.31E-06	1.83E-05	2.33E-05	6.31E-06	3.49E-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: Emission Calculations  
Natural Gas Combustion Only  
Three (3) Curing Ovens and One (1) Bake-off Oven**

**Company Name:** Creative Coatings, Inc.  
**Address:** 17505 Freedom Way, Fort Wayne, Indiana 46818  
**MSOP Renewal:** 003-18990  
**Pit ID:** 003-00297  
**Reviewer:** ERG/SD  
**Date:** July 26th, 2004

Heat Input Capacity  
MMBtu/hour

Potential Throughput  
MMCF/year

2.51 (4 Units Total)

22.0

	Pollutant					
Emission Factor (lb/MMCF)	* PM 7.6	* PM10 7.6	SO <sub>2</sub> 0.6	** NO <sub>x</sub> 100	VOC 5.5	CO 84
Potential To Emit (tons/year)	0.08	0.08	0.01	1.10	0.06	0.92

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

\*\*Emission factor for NO<sub>x</sub>: 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  
Natural Gas Combustion Only  
Three (3) Curing Ovens and One (1) Bake-off Oven**

**Company Name:** Creative Coatings, Inc.  
**Address:** 17505 Freedom Way, Fort Wayne, Indiana 46818  
**MSOP Renewal:** 003-18990  
**Pit ID:** 003-00297  
**Reviewer:** ERG/SD  
**Date:** July 26th, 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)	2.31E-05	1.32E-05	8.24E-04	1.98E-02	3.74E-05

**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)	5.49E-06	1.21E-05	1.54E-05	4.18E-06	2.31E-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  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Creative Coatings, Inc.  
**Address:** 17505 Freedom Way, Fort Wayne, Indiana 46818  
**MSOP Renewal:** 003-18990  
**Pit ID:** 003-00297  
**Reviewer:** ERG/SD  
**Date:** July 26th, 2004

Material	lb VOC/Gal of Coating	Gal of Material (gal/hour)	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (ton/year)	Transfer Efficiency
Acrylic Urethane	3.80	0.25	0.95	22.80	4.16	1.66	60%
Hardner DCX9	4.60	0.25	1.15	27.60	5.04	2.01	60%
Plastics Primer	6.70	0.25	1.68	40.20	7.34	2.93	60%
Semi Gloss Black	4.23	0.03	0.13	3.05	0.56	0.22	60%
Urethane Catalyst	2.54	0.03	0.08	1.83	0.33	0.13	60%
Yellow Primer	3.95	0.25	0.99	23.70	4.33	1.73	60%
Black Ura Zen	2.33	0.03	0.07	1.68	0.31	0.12	60%
Bake Blue Enamel	2.75	0.05	0.15	3.56	0.65	0.26	60%
Bake Black Enamel	2.80	0.03	0.09	2.22	0.40	0.16	60%
Corrosion R Primer	4.40	0.03	0.13	3.17	0.58	0.23	60%
Epoxy Primer DP90	5.40	0.03	0.16	3.89	0.71	0.28	60%
Reducer DT885	4.10	0.03	0.12	2.95	0.54	0.22	60%
Reducer DT870	3.80	0.03	0.11	2.74	0.50	0.20	60%
Primer Catalyst NCX275	4.40	0.03	0.13	3.17	0.58	0.23	60%
Primer Catalyst DP402LF	5.90	0.03	0.18	4.25	0.78	0.31	60%
<b>TOTAL =</b>				<b>26.8</b>		<b>10.7</b>	

Note: Coating applied on plastic parts using air assisted airless spray guns.

**METHODOLOGY**

Pounds of VOC per Gallon Coating = Density (lb/gal) \* Weight % Organics [As calculated by the source]

PTE of VOC (lbs/hour) = Pounds VOC per Gallon Coating (lb/gal) \* Gal of Material (gal/hour)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon Coating (lb/gal) \* Gal of Material (gal/hour \* 24 hours/day)

PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) \* Gal of Material (gal/hour) \* 8760 hours/year \* 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Pound VOC per Gallon Coating (lb/gal) \* Gal of Mat. (gal/hour) \* (1-Transfer Efficiency%) \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
HAP Emissions  
From Surface Coating Operations**

**Company Name:** Creative Coatings, Inc.  
**Address:** 17505 Freedom Way, Fort Wayne, Indiana 46818  
**MSOP Renewal:** 003-18990  
**Pit ID:** 003-00297  
**Reviewer:** ERG/SD  
**Date:** July 26th, 2004

Material	Density (lb/gal)	Gal of Material (gal/hour)	Weight % Ethyl Benzene	Weight % Styrene	Weight % Xylene	Weight % n-Butyl Acetate	Weight % Methyl Isobutyl Ketone	Weight % Hexamethylene Di Isocyanate	Weight % Methyl Ethyl Ketone	Weight % Toluene	Weight % n-Butyl Alcohol
Acrylic Urethane	9.02	0.250	4.99%	0.99%	29.0%	49.0%					
Hardner DCX9	8.90	0.250					19.0%	0.99%			
Plastics Primer	6.95	0.250	0.99%		9.00%				59.0%	29.0%	
Semi Gloss Black	10.3	0.030				5.00%					
Urethane Catalyst	8.82	0.030				15.0%					
Yellow Primer	12.3	0.250				10.0%				1.38%	
Black Ura Zen	8.89	0.030	5.30%		37.0%					1.27%	
Bake Blue Enamel	9.05	0.054									3.00%
Bake Black Enamel	8.60	0.033									2.00%
Corrosion R Primer	12.7	0.030				9.90%	9.90%				5.00%
Epoxy Primer DP 90	11.5	0.030	1.00%		5.00%		10.0%			5.00%	
Reducer DT885	7.04	0.030	0.99%		9.00%				19.0%	19.0%	
Reducer DT870	6.91	0.030							39.0%	20.0%	
Primer Catalyst NCX275	8.49	0.030	4.90%		9.90%						
Primer Catalyst DP402LF	7.78	0.030				10.0%			20.0%	5.00%	10.0%

Material	Density (lb/gal)	Gal of Material (gal/hour)	Potential To Emit (tons/year)								
			Ethyl Benzene	Styrene	Xylene	n-Butyl Acetate	Methyl Isobutyl Ketone	Hexamethylene Di Isocyanate	Methyl Ethyl Ketone	Toluene	n-Butyl Alcohol
Acrylic Urethane			0.49	0.10	2.86	4.84	0.00	0.00	0.00	0.00	0.00
Hardner DCX9			0.00	0.00	0.00	0.00	1.85	0.10	0.00	0.00	0.00
Plastics Primer			0.08	0.00	0.68	0.00	0.00	0.00	4.49	2.21	0.00
Semi Gloss Black			0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.00	0.00
Urethane Catalyst			0.00	0.00	0.00	0.17	0.00	0.00	0.00	0.00	0.00
Yellow Primer			0.00	0.00	0.00	1.34	0.00	0.00	0.00	0.19	0.00
Black Ura Zen			0.06	0.00	0.43	0.00	0.00	0.00	0.00	0.01	0.00
Bake Blue Enamel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06
Bake Black Enamel			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
Corrosion R Primer			0.00	0.00	0.00	0.17	0.17	0.00	0.00	0.00	0.08
Epoxy Primer DP90			0.02	0.00	0.08	0.00	0.15	0.00	0.00	0.08	0.00
Reducer DT885			0.01	0.00	0.08	0.00	0.00	0.00	0.18	0.18	0.00
Reducer DT870			0.00	0.00	0.00	0.00	0.00	0.00	0.35	0.18	0.00
Primer Catalyst NCX275			0.05	0.00	0.11	0.00	0.00	0.00	0.00	0.00	0.00
Primer Catalyst DP402LF			0.00	0.00	0.00	0.10	0.00	0.00	0.20	0.05	0.10
<b>TOTAL</b>			<b>0.71</b>	<b>0.10</b>	<b>4.25</b>	<b>6.69</b>	<b>2.17</b>	<b>0.10</b>	<b>5.22</b>	<b>2.89</b>	<b>0.27</b>

Single Highest HAP (tons/year) = 6.69  
Combination of HAPs (tons/year) = 22.4

Note: Coating applied on plastic parts using air assisted airless spray guns.

**METHODOLOGY**

PTE of HAPs (tons/year) = Density (lb/gal) \* Gal of Material (gal/hour) \* Weight % HAP \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Particulate Emissions  
From Two (2) Powder Coating Booths**

**Company Name:** Creative Coatings, Inc.  
**Address:** 17505 Freedom Way, Fort Wayne, Indiana 46818  
**MSOP Renewal:** 003-18990  
**Pit ID:** 003-00297  
**Reviewer:** ERG/SD  
**Date:** July 26th, 2004

Emission Unit	Max. Throughput Rate (lbs/hr)	Weight % Solids	Transfer Efficiency (%)	* PTE PM/PM10 Before Control (tons/year)	Control Efficiency (%)	* PTE of PM/PM10 After Control (tons/year)
Powder Coating Booths	208	100%	90%	91.1	90%	9.11

\*Assume all PM emissions are equal to PM10 emissions

Note: These booths are controlled by a cyclone which had been determined to be integral to control pursuant to MSOP No. 003-10783-00297, issued August 16, 1999.

**METHODOLOGY**

PTE before control PM/PM10 (tons/year) = Maximum Throughput Rate (lb/hour) \* Weight % Solids \* 8760 hours/year \* 1ton/2000 lbs \* (1-Transfer Efficiency %)

PTE after control PM/PM10 (tons/year) = Maximum Throughput Rate (lb/hour) \* Weight % Solids \* 8760 hours/year \* 1ton/2000 lbs \* (1-Transfer Efficiency %) \* (1-Control Efficiency %)

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Creative Coatings, Inc.  
**Address:** 17505 Freedom Way, Fort Wayne, Indiana 46818  
**MSOP Renewal:** 003-18990  
**Pit ID:** 003-00297  
**Reviewer:** ERG/SD  
**Date:** July 26th, 2004

**POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR**

<b>Emission Units</b>	<b>PM</b>	<b>PM10</b>	<b>VOC</b>	<b>NOx</b>	<b>SO<sub>2</sub></b>	<b>CO</b>	<b>** Highest Single HAP</b>	<b>Total HAPs</b>
Combustion Heaters	0.13	0.13	0.01	1.66	0.09	1.40		3.1E-02
Combustion Ovens	0.08	0.08	0.01	1.10	0.06	0.92		2.1E-02
Surface Coating	10.7	10.7	26.8				6.69	22.4
Powder Coating	9.11	9.11						
<b>TOTAL</b>	<b>20.0</b>	<b>20.0</b>	<b>26.8</b>	<b>2.76</b>	<b>0.15</b>	<b>2.32</b>	<b>6.69</b>	<b>22.5</b>