



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: September 23, 2005
RE: FireKing Security Products, LLC / 043-19238-00043
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 1/10/05



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**FireKing Security Products, LLC
111 Security Parkway
New Albany, Indiana 47150**

(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 043-19238-00043	
Issued by: Origin signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 23, 2005 Expiration Date: September 23, 2010

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary commercial storage safe manufacturing plant.

Authorized Individual:	President/Chief Financial Officer (CFO)
Source Address:	111 Security Parkway, New Albany, Indiana 47150
Mailing Address:	111 Security Parkway, New Albany, Indiana 47150
General Source Phone:	(812) 948-8400
SIC Code:	2522
County Location:	Floyd
Source Location Status:	Nonattainment for ozone under the 8-hour standard Non-attainment for PM-2.5 Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) Three (3) paint spray booths, identified as EU-8, EU-9, and EU-10, each installed in 1997, each using a high volume low pressure (HVLP) spray application system, coating a total maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through three (3) stacks, identified as S/V 8, S/V 9, and S/V 10;
- (b) One (1) primer drying room, constructed in 1994;
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) natural gas-fired furnace, identified as EU-2, with a maximum heat input capacity of 0.1 million British thermal units (MMBtu) per hour, exhausting to the atmosphere;
 - (2) Two (2) natural gas-fired water heaters, identified as EU-3 and EU-13, one with a maximum heat input capacity of 0.032 MMBtu per hour, and the other one with a maximum heat input capacity of 0.018 MMBtu per hour exhausting to the atmosphere;
 - (3) Two (2) natural gas-fired radiant space heaters, identified as EU-4 and EU-5, each with a maximum heat input capacity of 0.6 MMBtu per hour, exhausting to one (1) stack, S/V 7;
 - (4) One (1) natural gas-fired curing room heater, identified as EU-7, with a maximum heat input capacity of 0.092 MMBtu per hour, exhausting to one (1) stack, S/V 7;

- (5) One (1) natural gas-fired radiant space heater, identified as EU-12, with a maximum heat input capacity of 0.4 MMBtu per hour, exhausting to one (1) stack, S/V 7;
 - (6) One (1) natural gas-fired make up air unit, identified as EU-11, with a maximum heat input capacity of 5.3 MMBtu per hour, exhausting to the atmosphere;
 - (7) One (1) natural gas-fired phosphate wash heater, identified as EU-19, with a maximum heat input capacity of 0.55 MMBtu per hour, exhausting to one (1) stack, S/V 19.
 - (8) One (1) natural gas combination heater -evaporative cooler with a maximum heat input of 4.3 MMBtu, exhausting to the atmosphere.
 - (9) Two (2) Co-Ray Vac heaters each with a maximum heat input capacity of 0.15 MMBtu per hour; and
 - (10) One (1) heated air handler with a maximum heat input capacity of 4.3 MMBtu per hour.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (This is a small Safety Kleen parts washer used for maintenance purposes, using no more than 40 gallons per year) [326 IAC 8-3-5] [326 IAC 8-3-2];
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(e)];
- (f) Paved and unpaved roads and parking lots with public access;
- (g) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (h) An emission unit with uncontrolled PM-10 emissions of five (5) pounds per hour or twenty five (25) pounds per day (326 IAC 2-7-1(21)(B):
- One (1) primer sanding area, identified as EU-15, consisting of four (4) sanding work stations, identified as EU-15A through D, processing a maximum of nine (9) metal safes per hour, with all emissions captured by a single layer filter with an airflow rate of 11,500 cubic feet per minute (cfm), which filters the air and exhausts it back into the general workplace.
- (i) Other categories with emissions below insignificant thresholds:
- (1) One (1) aerosol can spraying cosmetic paint touch up operation, using a maximum of fifteen (15) pounds of VOC per day, exhausting to general ventilation; and
 - (2) One (1) 20 gallon covered dip tank used for rust preventative application.
- (j) One (1) plasma cutter with Torrit control unit [326 IAC 2-7-1(21)(xxiii)].

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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

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

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

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

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

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

B.5 Modification to Permit [326 IAC 2]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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]

- (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]

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]

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]

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 Compliance Response Plan - Preparation and Implementation

- (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.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

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

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

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

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

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

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

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

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

Emissions Unit Description:

- (a) Three (3) paint spray booths, identified as EU-8, EU-9, and EU-10, each installed in 1997, each using a high volume low pressure (HVLP) spray application system, coating a total maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through three (3) stacks, identified as S/V 8, S/V 9, and S/V 10;
- (b) One (1) primer drying room, constructed in 1994;

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

Emission Limitations and Standards

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts or products in each of the three (3) paint spray booths shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried, forced warm air dried, or extreme performance coatings.
- (b) Solvent sprayed from the application equipment during clean up 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.1.2 Particulate [326 IAC 6-3-2(d)]

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

- (a) Particulate from the surface coating processes (i.e. from booths EU-8, EU-9 and EU-10) shall each 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 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.1.3 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 these facilities and their control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.
- (b) The following calculations will show compliance with 326 IAC 8-2-9 using the volume weighted average method pursuant to 326 IAC 8-1-2(a)(7). The average VOC in pound per gallon of coating that will be emitted from the usage of the coatings in the three (3) spray booths is determined as follows:

$$\text{Average VOC in pound per gallon of coating} = \frac{3 (\text{lb VOC/gal of coating less water for each coating}) \times (\text{usage of each coating in gal/unit})}{\text{total volume of all coatings in gal/unit}}$$

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on 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 solvents;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (3) The cleanup solvent usage for each day; and
 - (4) The total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (This is a small Safety Kleen parts washer used for maintenance purposes, using no more than 40 gallons per year) [326 IAC 8-3-5] [326 IAC 8-3-2];

(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 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label, which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9OC) (one hundred twenty degrees Fahrenheit (120OF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.3

EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

(h) Other categories with emissions below insignificant thresholds:

- (1) One (1) aerosol can spraying cosmetic paint touch up operation, using a maximum of fifteen (15) pounds of VOC per day, exhausting to general ventilation; and

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

Any change or modification that would increase the actual VOC emissions from the touch up operation to greater than 15 pounds per day shall require approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1, before such change can occur.

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

D.3.2 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.3.1.
 - (1) The amount VOC 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. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC usage for each day; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	FireKing Security Products, LLC
Address:	111 Security Parkway
City:	New Albany, Indiana 47150
Phone #:	(812) 948-8400
MSOP #:	M043-19238-00043

I hereby certify that FireKing Security Products, LLC is still in operation.
 no longer in operation.

I hereby certify that FireKing Security Products, LLC is in compliance with the requirements of MSOP M043-19238-00043 .
 not in compliance with the requirements of MSOP M043-19238-00043.

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

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

Noncompliance:

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality

Addendum to the
Technical Support Document for a Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	FireKing Security Products, LLC
Source Location:	111 Security Parkway, New Albany, Indiana 47150
County:	Floyd
SIC Code:	2522
Operation Permit No.:	F043-11524-00043
Operation Permit Issuance Date:	February 23, 2000
MSOP No.:	M043-19238-00043
Permit Reviewer:	Seema Roy/EVP

On August 9, 2005, the Office of Air Quality (OAQ) had a notice published in the New Albany Tribune, New Albany, Indiana, stating that FireKing Security Products, LLC had applied for a Minor Source Operating Permit (MSOP) to operate a stationary commercial storage safe manufacturing plant. The notice also stated that OAQ proposed to issue a Minor Source Operating Permit (MSOP) for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 6, 2005, Evelyn Crooks of Environmental Compliance Source, Ltd. submitted comments on behalf of FireKing Security Products, LLC on the proposed MSOP. The summary of the comments is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment #1

In permit section A.1 it is necessary that the authorized individual for this source be either the President or the Chief Financial Officer (CFO). This will prevent any delay in obtaining the signature of an authorized individual on reports or documents related to the permit.

Response #1

IDEM, OAQ agrees and condition A.1 has been revised as follows:

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

The Permittee owns and operates a stationary commercial storage safe manufacturing plant.

Authorized Individual:	President/ Chief Financial Officer (CFO)
Source Address:	111 Security Parkway, New Albany, Indiana 47150
Mailing Address:	111 Security Parkway, New Albany, Indiana 47150
General Source Phone:	(812) 948-8400
SIC Code:	2522
County Location:	Floyd
Source Location Status:	Nonattainment for ozone under the 8-hour standard Non-attainment for PM-2.5 Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act

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

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

Source Background and Description

Source Name:	FireKing Security Products, LLC
Source Location:	111 Security Parkway, New Albany, Indiana 47150
County:	Floyd
SIC Code:	2522
Operation Permit No.:	F043-11524-00043
Operation Permit Issuance Date:	February 23, 2000
MSOP No.:	M043-19238-00043
Permit Reviewer:	Seema Roy/EVP

The Office of Air Quality (OAQ) has reviewed an MSOP application from FireKing Security Products, LLC (formerly known as Meilink Safe Company) relating to the operation of a commercial storage safe manufacturing plant. FireKing Security Products, LLC was issued a FESOP No. F043-11524-00043 on February 23, 2000 and submitted a FESOP renewal application to IDEM, OAQ on May 24, 2004. FireKing Security Products, LLC indicated that the primer paint spray booth, EU-14 and the finish paint spray booth, EU-16, which were permitted in the FESOP No. F043-11524-00043 were not installed. As a result of this all the criteria pollutants' potential to emit are less than 100 tons per year and single and combined HAP potential to emit are less than 10 tons per year and 25 tons per year respectively. Based on the calculations conducted by IDEM, the source wide potential to emit for the remaining equipment is at minor source levels. FireKing Security Products, LLC requested that the application be reviewed as an MSOP.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Three (3) paint spray booths, identified as EU-8, EU-9, and EU-10, each installed in 1997, each using a high volume low pressure (HVLP) spray application system, coating a total maximum of eight (8) metal safes per hour, with dry filters for particulate matter overspray control, exhausting through three (3) stacks, identified as S/V 8, S/V 9, and S/V 10;
- (b) One (1) primer drying room, constructed in 1994.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) natural gas-fired furnace, identified as EU-2, with a maximum heat input capacity of 0.1 million British thermal units (MMBtu) per hour, exhausting to the atmosphere;
 - (2) Two (2) natural gas-fired water heaters, identified as EU-3 and EU-13, one with a maximum heat input capacity of 0.032 MMBtu per hour, and the other one with a maximum heat input capacity of 0.018 MMBtu per hour exhausting to the atmosphere;

- (3) Two (2) natural gas-fired radiant space heaters, identified as EU-4 and EU-5, each with a maximum heat input capacity of 0.6 MMBtu per hour, exhausting to one (1) stack, S/V 7;
 - (4) One (1) natural gas-fired curing room heater, identified as EU-7, with a maximum heat input capacity of 0.092 MMBtu per hour, exhausting to one (1) stack, S/V 7;
 - (5) One (1) natural gas-fired radiant space heater, identified as EU-12, with a maximum heat input capacity of 0.4 MMBtu per hour, exhausting to one (1) stack, S/V 7;
 - (6) One (1) natural gas-fired make up air unit, identified as EU-11, with a maximum heat input capacity of 5.3 MMBtu per hour, exhausting to the atmosphere;
 - (7) One (1) natural gas-fired phosphate wash heater, identified as EU-19, with a maximum heat input capacity of 0.55 MMBtu per hour, exhausting to one (1) stack, S/V 19.
 - (8) One (1) natural gas combination heater -evaporative cooler with a maximum heat input of 4.3 MMBtu, exhausting to the atmosphere.
 - (9) Two (2) Co-Ray Vac heaters each with a maximum heat input capacity of 0.15 MMBtu per hour; and
 - (10) One (1) heated air handler with a maximum heat input capacity of 4.3 MMBtu per hour.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (This is a small Safety Kleen parts washer used for maintenance purposes, using no more than 40 gallons per year) [326 IAC 8-3-5] [326 IAC 8-3-2];
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(e)];
- (f) Paved and unpaved roads and parking lots with public access;
- (g) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (h) An emission unit with uncontrolled PM-10 emissions of five (5) pounds per hour or twenty five (25) pounds per day (326 IAC 2-7-1(21)(B):
- One (1) primer sanding area, identified as EU-15, consisting of four (4) sanding work stations, identified as EU-15A through D, processing a maximum of nine (9) metal safes per hour, with all emissions captured by a single layer filter with an airflow rate of 11,500 cubic feet per minute (cfm), which filters the air and exhausts it back into the general workplace.
- (i) Other categories with emissions below insignificant thresholds:
- (1) One (1) aerosol can spraying cosmetic paint touch up operation, using a maximum of fifteen (15) pounds of VOC per day, exhausting to general ventilation; and
 - (2) One (1) 20 gallon covered dip tank used for rust preventative application.

- (j) One (1) plasma cutter with Torrit control unit [326 IAC 2-7-1(21)(xxiii)].

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

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

- (a) Operation Permit No. F043-11524-00043 issued on February 23, 2000;
- (b) First Administrative Amendment No. 043-12989-00043 issued on December 13, 2000;
- (c) Second Administrative Amendment No. 043-13734-00043 issued on March 12, 2001;
- (d) Third Administrative Amendment No. 043-14235-00043 issued on April 25, 2001;
- (e) Fourth Administrative Amendment No. 043-14695-00043 issued on September 19, 2001;
- (f) Fifth Administrative Amendment No. 043-14854-00043 issued on October 16, 2001;
- (g) First Reopening No. 043-13040-00043 issued on December 26, 2001.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) Operation Permit No. F043-11524-00043 issued on February 23, 2000.

D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The total usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the five (5) paint spray booths shall be limited to 96.07 tons per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the source wide potential to emit of VOC to less than 100 tons per year. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.
- (b) The total usage of any combination of HAP, including coatings, dilution solvents, and cleaning solvents, in the five (5) paint spray booths shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. Compliance with these limits makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 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.

Reason not incorporated: The source never installed spray booths EU-14 and EU-16, which were permitted in the FESOP 043-11524-00043, issued on February 23, 2000, because of which the potential emissions are less than 100 tpy and the source is at MSOP level. Therefore the FESOP requirements are no longer applicable to the source.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this MSOP:

All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

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.

A complete application for the purposes of this review was received on May 24, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	37.17
PM-10	37.58
SO ₂	0.04
VOC	73.62
CO	6.10
NO _x	7.27

HAPs	Potential to Emit (tons/yr)
Xylene	Less than 10
Ethylbenzene	Less than 10
Hexamethylene Diisocyanate	Less than 10
MIBK	Less than 10
Ethylene Glycol	Less than 10
Chromium	Less than 10
Toluene	Less than 10
TDI	Less than 10
Hexane	Less than 10
Total	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than 25 tons per year and less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) 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 Floyd County.

Pollutant	Status
PM-2.5	Non-Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Non-Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Floyd County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Floyd County has been classified as attainment or unclassifiable in Indiana for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	84.62
PM-10	84.82
SO ₂	0.02
VOC	99
CO	2.87
NO _x	3.42
Single HAP	9.84
Combination HAPs	24

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) 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 and it is not in one of the 28 listed source categories.
- (c) These emissions were based on FESOP No. F043-11524-00043 issued on February 23, 2000.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit M043-19238-00043, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.

State Rule Applicability – Entire Source

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

Although the source was constructed after the August 7, 1977 PSD rule applicability date it is not considered a major source because it does not have the potential to emit 250 tons per year or more of any criteria pollutant and it is not one of the 28 listed source categories. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 do not apply.

326 IAC 2-3 (Emission Offset)

The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as nonattainment. Since this source is located in Floyd County, which is designated as non-attainment for the 8-hour ozone standard, the applicability threshold for 326 IAC 2-3 (Emission Offset) is 100 tons per year for VOC and NOx. Since the source wide VOC and NOx emissions are less than 100 tons per year, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

Nonattainment NSR

Floyd County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area as a source that emits or has the potential to emit 100 tpy of any regulated pollutant. FireKing Security Products, LLC. has an uncontrolled potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, the requirements of Nonattainment NSR do not apply.

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE of 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). There are no facilities with an uncontrolled PTE of 10 tons per year of any single HAP and 25 tons per year of the combination of HAPs that have been constructed or reconstructed since July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this source.

326 IAC 2-6 (Emission Reporting)

Since this source is complying with 326 IAC 2-6.1 and is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is not subject to 326 IAC 2-6 (Emission Reporting).

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 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This rule does not apply to this source. For a source located in Floyd County, this rule applies to those sources that emit or have the potential to emit equal to or greater than 100 tons per year of VOC or those sources that have coating facilities which emit or have the potential to emit equal to or greater than ten (10) tons per year of VOC. The three (3) spray booths (EU8, EU9, and EU10), which make up one (1) facility, have actual VOC emissions of greater than 15 pounds per day. This is greater than the applicability levels of 326 IAC 8-2. These booths also belong to the miscellaneous metal coating operations source category under 326 IAC 8-2. Therefore, pursuant to 326 IAC 8-7-2(a)(1) and (3), the emissions from these booths would not be included in determining if the applicability thresholds for this rule are exceeded. Since potential VOC emissions from all other facilities at this source are less than 10 tons per year, this source is not subject to the requirements of this rule.

State Rule Applicability – Individual Facilities

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

- (a) Particulate from the surface coating processes (i.e. from booths EU-8, EU-9 and EU-10) shall each 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:

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

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

- (b) The primer sanding area, EU-15 is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because it is a manufacturing process which is exempt from this rule pursuant to 326 IAC 6-3-1(b)(13) as the potential uncontrolled PM-10 emissions are less than one (1) pound per day because of which it is considered a trivial activity under 326 IAC 2-7-1(40).
- (c) 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. This includes the following activities:

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

This rule applies to new facilities, constructed after January 1, 1980, with potential VOC emissions of equal to or greater than 25 tons per year, and not subject to any other requirements of 326 IAC 8. Since the three (3) spray booths, EU-8, EU-9 and EU-10, are all subject to the requirements of 326 IAC 8-2-9, they are not subject to the requirements of this rule.

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

(a) The three (3) spray booths (EU8, EU9, and EU10), which make up one (1) facility, were constructed in 1997, and have actual VOC emissions of greater than 15 pounds per day. Therefore, all the three (3) spray booths, which coat metal safes, are subject to the requirements of this rule. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators in each of the three (3) spray booths, in which air dried coatings or extreme performance coatings are used, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or extreme performance coatings.

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.

The following calculations will show compliance with 326 IAC 8-2-9. The volume weighted average method is used to calculate the average VOC in pound per gallon of coating that will be emitted from the usage of the coatings in the three (3) spray booths.

VOC limit = 3.5 pound of VOC per gallon of coating less water for air dried or extreme performance coatings.

$$\text{Average VOC in pound per gallon of coating} = \frac{3 (\text{lb VOC/gal of coating less water for each coating}) \times (\text{usage of each coating in gal/unit})}{\text{total volume of all coatings in gal/unit}}$$

$$\text{Average VOC in pound per gallon coating less water (VF/F)} = (V_1 \times F_1 + V_2 \times F_2 + V_3 \times F_3 \dots + V_7 \times F_7) / F$$

$$\text{Where } F = F_1 + F_2 + F_3 \dots + F_7$$

$$V_1 \times F_1 = \frac{\text{Density (lb/gal)} \times (\text{Wt. \% volatiles} - \text{Wt. \% water}) \times (\text{gal/unit})}{(1 - \text{weight \% water}) \times (\text{density of coating}) / (\text{density of water})}$$

Coating	Booth ID	Density (lb/gal)	F Volume of each Coating (gal/unit)	Wt% Volatile	Wt% Water	(1-Wt.% Water) x [(Coating Density) / (Water Density)]	VF
Polane T Plus	EU 8-10	11.36	0.500	35.41	0.00	1.361	1.478
Polane Primer	EU 8-10	8.67	0.375	87.80	81.40	0.193	1.078
Plane HS	EU 8-10	10.21	0.500	33.69	0.00	1.223	1.406
Polane 2.8 Plus Sprayfill	EU 8-10	13.60	0.375	19.9	0.0	1.63	0.623
Total			1.75				4.585

Therefore, $VF/F = 4.585 / 1.75 = 2.62$ pound of VOC per gallon of coating less water and the spray booths are in compliance with 326 IAC 8-2-9.

- (b) Input volatile organic compounds (VOC) used in the aerosol can spraying touch up operation is less than or equal to 15 pounds per day. Therefore, 326 IAC 8-2-9 will not apply. Any change or modification that would increase the actual VOC emissions from the touch up operation to greater than 15 pounds per day shall require approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1, before such change can occur.

326 IAC 8-3-2 (Cold Cleaner Degreaser Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the source shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9OC) (one hundred twenty degrees Fahrenheit (120OF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Conclusion

The operation of this commercial storage safe manufacturing plant shall be subject to the conditions of the Minor Source Operating Permit 043-19238-00043.

Appendix A: Emission Calculations Summary

Company Name: FireKing Security Products, LLC
Address City IN Zip: 111 Security Parkway, New Albany, Indiana 47150
MSOP No.: 043-19238-00043
Reviewer: Seema Roy/EVP

Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Surface Coating	Natural Gas Combustion	Aerosol Can Touch Up	Primer Sanding Area	TOTAL
PM	35.79	0.14	0.00	1.24	37.17
PM10	35.79	0.55	0.00	1.24	37.58
SO2	0.00	0.04	0.00	0.00	0.04
NOx	0.00	7.27	0.00	0.00	7.27
VOC	70.48	0.40	2.74	0.00	73.62
CO	0.00	6.10	0.00	0.00	6.10
total HAPs	16.89	0.14	0.00	0.00	17.03
worst case single HAP	8.94	0.13	0.00	0.00	9.07
	(Toluene)	(Hexane)			
Total emissions based on rated capacity at 8,760 hours/year.					
Controlled Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Surface Coating	Natural Gas Combustion	Aerosol Can Touch Up	Primer Sanding Area	TOTAL
PM	35.79	0.14	0.00	0.20	36.13
PM10	35.79	0.55	0.00	0.20	36.54
SO2	0.00	0.04	0.00	0.00	0.04
NOx	0.00	7.27	0.00	0.00	7.27
VOC	70.48	0.40	2.74	0.00	73.62
CO	0.00	6.10	0.00	0.00	6.10
total HAPs	16.89	0.14	0.00	0.00	17.03
worst case single HAP	8.94	0.13	0.00	0.00	9.07
Total emissions based on rated capacity at 8,760 hours/year.					

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: FireKing Security Products, LLC
Address City IN Zip: 111 Security Parkway, New Albany, Indiana 47150
MSOP No.: 043-19238-00043
Reviewer: Seema Roy/EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Weight % Hexamethylene Diisocyanate	Weight % MIBK	Weight % Ethylene Glycol	Weight % Chromium	Weight % Toluene	Weight % TDI	Weight % Glycol Ethers
Primer Booths (EU8, EU9, and EU10)												
Polane T Plus	11.36	0.5000	8.000	3.94%	0.56%	0.04%	1.55%	2.25%	0.00%	0.00%	0.00%	0.14%
Polane Primer	8.67	0.3750	8.000	0.00%	0.00%	0.00%	0.00%	2.91%	0.15%	0.00%	0.00%	0.00%
Polane 2.8 Plus Sprayfill	13.60	0.3750	8.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.16%	0.00%
Polane HS	10.21	0.5000	8.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.16%	0.00%

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Hexamethylene Diisocyanate Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Chromium Emissions (ton/yr)	Toluene Emissions (ton/yr)	TDI Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Primer Booths (EU8, EU9, and EU10)												
Polane T Plus	11.36	0.5000	8.000	7.84	1.11	0.09	3.08	4.48	0.00	0.00	0.00	0.28
Polane Primer	8.67	0.3750	8.000	0.00	0.00	0.00	0.00	3.32	0.17	0.00	0.00	0.00
Polane HS	13.60	0.3750	8.000	0.00	0.00	0.00	0.00	0.00	0.00	1.79	0.29	0.00
Polane HS	10.21	0.5000	8.000	0.00	0.00	0.00	0.00	0.00	0.00	7.16	0.29	0.00
				7.84	1.11	0.09	3.08	4.48	0.17	8.94	0.57	0.28

Uncontrolled Potential Emissions

Total Worst Case Coating (Polane T Plus) HAPs: 16.89

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: FireKing Security Products, LLC
Address City IN Zip: 111 Security Parkway, New Albany, Indiana 47150
MSOP No.: 043-19238-00043
Reviewer: Seema Roy/EVP**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
---------------------------------	---------------------------------

16.6	145.3
------	-------

Facilities	MMBtu/hr
Furnace (1)	0.1
Heaters (9)	2.592
Make Up Air Unit	5.3
Heater-Evap. Cooler	4.3
Air Handler	4.3
Total	16.59

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.14	0.55	0.04	7.27	0.40	6.10

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 HAPs Emissions**

**Company Name: FireKing Security Products, LLC
 Address City IN Zip: 111 Security Parkway, New Albany, Indiana 47150
 MSOP No.: 043-19238-00043
 Reviewer: Seema Roy/EVP**

HAPs - Organics

	Benzene	ethene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.526E-04	8.721E-05	5.450E-03	1.308E-01	2.471E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.634E-05	7.994E-05	1.017E-04	2.762E-05	1.526E-04

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.

Appendix A: Primer Sanding Area Particulate Emissions

Company Name: FireKing Security Products, LLC
Address City IN Zip: 111 Security Parkway, New Albany, Indiana 47150
MSOP No.: 043-19238-00043
Reviewer: Seema Roy/EVP

Uncontrolled Potential Emissions (tons/year)					
A. Dry Filter					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (ACFM)	Control Efficiency	Total (tons/yr)
EU-15	1	0.00046	11500.0	84.00%	1.24
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					1.24
Controlled Potential Emissions (tons/year)					
A. Dry Filter					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (ACFM)	Control Efficiency	Total (tons/yr)
EU-15	1	0.00046	11500.0	84.00%	0.20

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source control:

0.20

Methodology:Potential (uncontrolled):

Emissions rate (PM) = PM after controls (ton/yr)/(1-control efficiency)

Potential (controlled):

Emissions rate (PM) = Grain loading per actual cubic foot of air outlet (gr/cf)*Air flow rate in actual cubic feet per minute*60 minutes per hour/7000 grains per pound/2000 pounds*8760 hours per year.