



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

November 24, 2004

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

TO: Interested Parties / Applicant

RE: Imagineering Enterprises, Inc / 141-19435-00090

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

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 9/16/03



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

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Lori F. Kaplan  
Commissioner

Ms. Nancy Norton  
Imagineering Enterprises, Inc.  
1302 West Sample Street  
South Bend, IN 46619

Re: 141-19435-00090  
Second Significant Revision to  
FESOP 141-14152-00090

Dear Ms. Norton:

Imagineering Enterprises, Inc. was issued a FESOP on November 18, 2002 for stationary metal automotive and general commercial transportation finishing and coating source. A letter requesting changes to this permit was received on July 30, 2004. Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The purpose of this revision is to exempt booth K-6 from the state rule requirements of 326 IAC 8-2-9 using rule 326 IAC 8-2-1. Pursuant to the provisions of 326 IAC 2-8-11.1(g)(3), the permit is hereby revised as follows, with deleted language as ~~strikeouts~~ and new language **bolded**:

## Emission Limitations and Standards [326 IAC 2-8-4(1)]

### ~~D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]~~

- ~~(a) For the topcoat operation, the VOC delivered to a coating applicator that applies extreme performance coatings shall be limited to 3.5 pounds of VOC per gallon of coating excluding water.~~
- ~~(b) For the primer operation, the VOC delivered to a coating applicator shall be limited to 3.0 pounds of VOC per gallon of coating, excluding water.~~
- ~~(c) Pursuant to 326 IAC 8-1-1(b), the requirements of 8-2 (listed here as D.4.1(a) and D.4.1(b)) are not applicable on days that the VOC delivered to the applicator is limited to less than 15 pounds per day.~~

### **D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-1]**

- (a) Pursuant to 326 8-2-1(a)(4), the VOC usage delivered to the applicator shall be limited to less than 15 pounds per day.**
- (b) Any change or modification to this booth which would increase the actual emissions of VOC to greater than 15 pounds per day will require prior approval from IDEM, OAQ.**

#### D.4.5 Record Keeping Requirements

- (2) For coatings used for D.4.1(~~e~~), the VOC content of each coating material and the solvents used. These records shall be kept on a daily basis.

#### D.4.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1(~~e~~) shall be submitted the address listed in Section C...

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nathan Bell, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Nathan Bell or extension (4-3350), or dial (317) 234-3350.

Sincerely,

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

#### Attachments

NCB

cc: File - St. Joseph County  
U.S. EPA, Region V  
St. Joseph County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Rick Reynolds  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Permit Tracking



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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Imagineering Enterprises, Inc.  
1302 West Sample Street  
South Bend, Indiana 46619-3894**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 141-14152-00090	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 18, 2002  Expiration Date: November 18, 2007

First Administrative Amendment 141-16781, issued on November 27, 2002.

First Significant Permit Revision 141-17211, issued on April 2, 2003

Second Administrative Amendment 141-18648, issued on March 25, 2004.

Second Significant Permit Revision 141-19435	Pages Amended: 36a, 36b
Issued by: Original signed by  Paul Dubenetzky, Branch Chief Office of Air Quality	Date Issued: November 24, 2004

## SECTION D.4 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10): Coating operations

- (n) One paint booth, identified as K-6, equipped with electrostatic airless guns, including dry filters for overspray control, exhausted thru Duct E.

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

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-1]

- (a) Pursuant to 326 8-2-1(a)(4), the VOC usage delivered to the applicator shall be limited to less than 15 pounds per day.
- (b) Any change or modification to this booth which would increase the actual emissions of VOC to greater than 15 pounds per day will require prior approval from IDEM, OAQ.

#### D.4.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the one paint booth, K-6, shall not exceed the pound per hour emission rate established as E in the following formulas:

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:

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour.}$$

#### D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one paint booth, K-6.

### Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

#### D.4.4 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stack

(Duct E). The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack (Duct E) and the presence of overspray on the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspection and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]**

##### **D.4.5 Record Keeping Requirements**

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1 and 2) below. Records maintained for (1) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits.
  - (1) The VOC content of each coating material and the 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) For coatings used for D.4.1, the VOC content of each coating material and the solvents used. These records shall be kept on a daily basis.
- (b) To document compliance with Condition D.4.4, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

##### **D.4.6 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.4.1 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. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Technical Support Document (TSD) for a Significant Permit Revision to a Federally  
Enforceable State Operating Permit (FESOP)

**Source Background and Description**

<b>Source Name:</b>	<b>Imagineering Enterprises, Inc.</b>
<b>Source Location:</b>	<b>1302 West Sample Street, South Bend, Indiana 46619-3894</b>
<b>County:</b>	<b>St. Joseph</b>
<b>SIC Code:</b>	<b>3471/3479</b>
<b>Operation Permit No.:</b>	<b>F 141-14152-00090</b>
<b>Operation Permit Issuance Date:</b>	<b>November 18, 2002</b>
<b>Permit Revision No.:</b>	<b>141-19435</b>
<b>Permit Reviewer:</b>	<b>Nathan Bell</b>

The Office of Air Quality (OAQ) has reviewed a revision application from Imagineering Enterprises, Inc. relating to the operation of paint booth K-6.

**Explanation of Revision**

Paint booth K-6 was modified in Significant Permit Revision 17211, which provided an exemption under 326 IAC 8-1-1(b) from the requirements of 326 8-2-9. The revision was subsequently submitted to the U.S. EPA for approval as a site-specific revision to Indiana's State Implementation Plan as required by 326 IAC 8-1-1(d). The U.S. EPA has indicated that such a revision cannot be approved unless volatile organic compound emissions from the source are limited to less than 15 pounds per day actual emissions regardless of whether the compliant or noncompliant coatings are used.

The purpose of the current revision is to exempt booth K-6 from the state rule requirements of 326 IAC 8-2-9 using rule 326 IAC 8-2-1.

**Justification for the Revision**

The FESOP is being revised through a Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(g)(3): "Any modifications that change any existing requirements for the units or processes under the cap."

Since this would remove rule applicability for Rule 326 IAC 8-2-9, this revision will be significant.

**Recommendation**

The staff recommends to the Commissioner that the Significant Permit Revision 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 July 30, 2004.

## Changes to Permit

The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded**. Pursuant to the provisions of 326 IAC 2-8-11.1(g)(3), the permit is hereby revised as follows:

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### ~~D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]~~

- ~~(a) For the topcoat operation, the VOC delivered to a coating applicator that applies extreme performance coatings shall be limited to 3.5 pounds of VOC per gallon of coating excluding water.~~
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#### **D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-1]**

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#### D.4.5 Record Keeping Requirements

- (2) For coatings used for D.4.1(e), the VOC content of each coating material and the solvents used. These records shall be kept on a daily basis.

#### D.4.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1(e) shall be submitted the address listed in Section C...

## Conclusion

This permit revision shall be added to the conditions of the FESOP as 141-19435-00090.