



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

September 30, 2004

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Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
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TO: Interested Parties / Applicant

RE: Prince Manufacturing, Inc / 113-19666-00032

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

### Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER-AM.dot 9/16/03

September 30, 2004

Steven Scales  
Prince Manufacturing, Inc.  
205 Green Drive  
Avilla, Indiana 46710

Re: 113-19666  
Second Notice Only Change to  
MSOP 113-15060-00032

Dear Steven Scales:

Prince Manufacturing, Inc. was issued a MSOP on February 4, 2002 for a military vehicle parts manufacturing operation. A letter requesting changes to this permit was received on June 7, 2004. Pursuant to the provisions of 326 IAC 2-6.1-6(d), a notice only change to this permit is hereby approved as described in the attached Technical Support Document.

The revision adds the painting of fiberglass parts to two of the paint booths at this operation.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the notice only change into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this change and the following revised 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 Donald Poole, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015 or call at (800) 451-6027 and ask for Donald Poole or extension 2-8327 or dial 317-232-8327.

Sincerely,

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

Attachments

drp

cc: File – Noble County  
U.S. EPA, Region V  
Noble County Health Department  
Air Compliance Section Inspector – Doyle Houser  
Compliance Data Section  
Administrative and Development

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

Technical Support Document (TSD) for a Notice Only Change to a Minor Source Operating Permit

**Source Background and Description**

<b>Source Name:</b>	<b>Prince Manufacturing, Inc.</b>
<b>Source Location:</b>	<b>205 Green Drive, Avilla, Indiana 46710</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>3479</b>
<b>Operation Permit No.:</b>	<b>113-15060-00032</b>
<b>Operation Permit Issuance Date:</b>	<b>February 4, 2002</b>
<b>Permit Revision No.:</b>	<b>113-19666</b>
<b>Permit Reviewer:</b>	<b>drpoole</b>

The Office of Air Quality (OAQ) has reviewed an application from Prince Manufacturing, Inc. relating to the painting of fiberglass parts in two of their paint booths. The paint booths involved would be PB-1 and PB-2. The parts to be painted would be fiberglass hoods for the Hummer.

**Existing Approvals**

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

- (a) MSOP 113-15060 issued on February 4, 2002; and
- (b) First Notice Only Change 113-15398 issued on March 26, 2002.

**Justification for the Revision**

The MSOP is being modified through a Notice Only Change. This change is being performed pursuant to 326 IAC 2-6.1-6(d) which is used for modifications with a potential to emit VOC of less than 10 tons per year.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Notice Only Change 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 June 7, 2004. Additional information was supplied on August 17, 2004 and September 7, 2004.

**Emission Calculations**

The emissions are calculated as follows:

The paint involved has a VOC content of 5.33 pounds per gallon. The amount to be used is 0.111 gallons per unit. The production rate is 45 units per day. Based upon this information, the potential emissions are:

$$(5.33 \text{ lb VOC/gal})(0.111 \text{ gal./unit})(45 \text{ unit/day})(365 \text{ day/yr})(1 \text{ ton}/2000 \text{ lb})(2 \text{ booths}) = 9.7 \text{ tons VOC per year.}$$

The potential to emit for each booth would be much less than 25 tons per year for rule 8-1-6. Therefore, a warning limit would be imposed in the permit.

For PM emissions, the paint has a weight percent solids of 53.6%. The transfer efficiency is 70%. The paint booths have the PM controlled by dry filters. The dry filters have an efficiency of 80%.

$$(10.31 \text{ lbs./gal.})(0.536 \text{ lb. solids/lb. coating})(0.111 \text{ gal./unit})(45 \text{ unit/day})(365 \text{ day/yr})(1 \text{ ton}/2000 \text{ lb})(0.3 \text{ eff}) = 1.5 \text{ ton PM/yr}$$

$$(1.5 \text{ ton PM/yr})(1-0.8) = 0.3 \text{ ton PM/yr}$$

For HAPs, the paint contains xylene at 4.0% by weight and ethylbenzene at 0.8% by weight.

$$(10.31 \text{ lbs./gal.})(0.04 \text{ lb xylene/lb coating})(0.111 \text{ gal./unit})(45 \text{ unit/day})(365 \text{ day/yr})(1 \text{ ton}/2000 \text{ lb}) = 0.4 \text{ tons xylene/yr}$$

$$(10.31 \text{ lb./gal.})(0.008 \text{ lb ethylbenzene/lb. coating})(0.111 \text{ gal./unit})(45 \text{ unit/day})(365 \text{ day/yr})(1 \text{ ton}/2000 \text{ lb}) = 0.1 \text{ tons ethylbenzene/yr}$$

**Potential to Emit of the Change 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	1.5
PM-10	1.5
SO <sub>2</sub>	-
VOC	9.7
CO	-
NO <sub>x</sub>	-

HAPs	Potential to Emit (tons/yr)
Xylene	0.4
Ethylbenzene	0.1
Total	0.5

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is less than 100 tons per year. The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this revision will be accomplished thru a notice only change to the MSOP.
- (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 Noble County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1 hour Ozone	Attainment
8 hour Ozone	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. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Noble County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

**Source Status**

Existing Source PSD, Part 70, or 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	7.3 + 1.5 = 8.8
PM-10	7.7 + 1.5 = 9.2
SO <sub>2</sub>	-
VOC	60.22 + 28.3 + 9.7 = 98.2
CO	7.2
NO <sub>x</sub>	8.5
Single HAP	3.8
Combination HAPs	16.5

- (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) These emissions were based on summation of the emissions from the Technical Support Documents for permits 15060 and 15398. The single HAP amount was not adjusted. The combination of HAPs amount was not adjusted.

**Proposed Revision**

PTE from the proposed modification (based on 8760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	1.5	1.5	-	9.7	-	-
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 113-19666-00032, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) a 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.

**Federal Rule Applicability**

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

**State Rule Applicability – Entire Source**

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

The operation of this plant including the revision will still emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because this is not a Title V source. Therefore, 326 IAC 2-6 does not apply.

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.

### **State Rule Applicability – Individual Facilities**

#### 326 IAC 6-3-2 (Process Operations)

Rule 6-3-2 is already applicable to these two booths from the prior permits. Conditions D.1.2, D.1.6, and D.1.7 from permit 15060 cover this rule's requirements. No addition is necessary for this change.

#### 326 IAC 8-1-6 (New facilities, general reduction requirements)

The source will be painting fiberglass hoods in paint booths PB-1 and PB-2. The potential emissions from this painting is determined to be 9.7 tons VOC per year. This potential per booths is 4.85 tons of VOC per year. This is less than 25 tons per year. Therefore, rule 8-1-6 will not apply.

### **Changes to the Permit**

Additions will be shown in bold. Subtractions will be shown in strikeout.

- 1) Condition D.1.2 will be added to the permit.

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

**Any change or modification which would increase the potential to emit for booth PB-1 or booth PB-2 when coating fiberglass to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.**

- 2) Condition D.1.9(b) will be amended as follows:

(b) To document compliance with Condition D.1.7 ~~8~~

### **Conclusion**

The construction and operation of this additional fiberglass coating shall be subject to the conditions of the Notice Only Change 113-19666-00032.