



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 21, 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: NCP Coatings, Inc / 141-19769-00196

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

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December 21, 2004

Mr. M. Sherman Drew, Jr.
NCP Coatings, Inc.
1413 Clover Road
Mishawaka, IN 46545

Re: 141-19769
First Minor Permit Revision to
MSOP 141-19769-00196

Dear Mr. Drew:

NCP Coatings, Inc. was issued a permit on April 9, 2004 for a paint manufacturing operation. A letter requesting changes to this permit was received on October 21, 2004. Pursuant to the provisions of 326 IAC 2-6.1-6 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the construction and operation of one (1) natural gas fired air makeup unit, one (1) new paint mixing line (Mix Line #3), and addition of one (1) batch mill and mixer to Mix line #1.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this revision 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 Adeel Yousuf, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3252, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

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

Attachments
AY/EVP

cc: File – St. Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
Northern Regional Office
Air Compliance Section Inspector
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



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**MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

And

St. Joseph County Local Agency

**NCP Coatings, Inc.
1413 Clover Road
Mishawak, Indiana 46545**

(herein known as the Permittee) is hereby authorized to *construct and* 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 141-15583-00196	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 9, 2002 Expiration Date: April 9, 2007

First Notice Only Change 141-16903-00196, issued on January 14, 2003
Second Notice Only Change 141-19416-00196, issued on September 9, 2004

First Minor Permit Revision: 141-19769-00196	
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Pages Affected: 4, 5, 18, and 22 Issuance Date: December 21, 2004

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and St. Joseph County Local Agency. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a paint manufacturing operation.

Authorized individual:	Executive Vice President
Source Address:	1413 Clover Road, Mishawaka, Indiana 46545
Mailing Address:	1413 Clover Road, Mishawaka, Indiana 46545
SIC Code:	2851
Source Location:	St. Joseph
County Status:	Attainment for Ozone under the 1-hr standard Basic nonattainment for Ozone under the 8-hour standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit (MSOP)

2. Condition A.2 has been revised as follows to incorporate the new units.

A.2 Emissions units and Pollution Control Equipment Summary

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

- (a) One (1) paint mixing line, identified as Mix Line #1, including four (4) paint mixer tanks, identified as Mixer #s 6, 7, 8, and 10, and one (1) 20 liter horizontal small batch mill and mixer, with particulate matter from the mixing line controlled by Torit Dust Collector D-1;
- (b) One (1) natural gas-fired boiler, identified as BH-5, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr);
- (c) Two (2) natural gas-fired heaters, identified as H-3 and H-4, each will have a heat input capacity of 0.25 MMBtu/hr;
- (d) Four (4) submerged filling stations, identified as 1 through 4;
- (e) Four (4) storage tanks, identified as Tank #3; Tank #4; Tank #5; and Tank PG-1, respectively;
- (f) Twelve (12) solvent tote tanks;
- (g) Space heaters, process heaters, or boilers, with heat input equal to or less than six million (6,000,000) Btu per hour, combusting propane, liquified petroleum gas, or butane;
- (h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (i) Activities including the replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (j) Paved and unpaved roads and parking lots with public access;

- (k) Blowdown of sight glasses, boilers, compressors, pumps and/or cooling towers;
- (l) One (1) miscellaneous paint drum/can storage area;
- (m) One (1) paint mixing line, identified as Mix Line # 3, including two (2) paint mixer tanks, with particulate matter from the mixing line controlled by Torit Dust Collector D-2; and
- (n) One (1) natural gas-fired air makeup unit, identified as AM-1, with a maximum heat input capacity of 0.25 MMBtu/hr.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

- (a) One (1) paint mixing line, identified as Mix Line #1, including four (4) paint mixer tanks, identified as Mixer #s 6, 7, 8, and 10, and one (1) 20 liter horizontal small batch mill and mixer, with particulate matter from the mixing line controlled by Torit Dust Collector D-1;
- (b) Four (4) submerged filling stations, identified as 1 through 4;
- (c) Four (4) storage tanks, identified as Tank #3; Tank #4; Tank #5; and Tank PG-1, respectively;
- (d) Twelve (12) solvent tote tanks;
- (e) One (1) miscellaneous paint drum/can storage area; and
- (f) One (1) paint mixing line, identified as Mix Line # 3, including two (2) paint mixer tanks, with particulate matter from the mixing line controlled by Torit Dust Collector D-2.

Emission Limitations and Standards

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

The owner or operator shall limit the amount of VOCs from Mixing Line 1 to 24 tons per year, based on a 12 month rolling total.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) The owner or operator shall limit the particulate matter (PM) from Mixing Line 1 (Mixer #s 6, 7, 8, and 10) to 2.44 pounds per hour based on the following formula.
- (b) The owner or operator shall limit the particulate matter (PM) from Mixing Line 1 (one (1) 20 liter horizontal small batch mill and mixer) to 1.06 pounds per hour based on the following formula.
- (c) The owner or operator shall limit the particulate matter (PM) from Mix Line # 3 to 1.926 pounds per hour based on the following formula.

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:

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

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

D.1.3 Control Equipment Standards [326 IAC 6-3-2]

To achieve compliance with the PM limit of Condition D.1.2, the owner or operator shall install dustcollectors D-1, and D-2 and the associated capture system. Said dustcollectors and capture system shall be operated all times when either Mixing Line 1 is in operation, and shall be operated, at a minimum, at the parameters that achieve compliance with the limits of Condition D.1.2.

Should the owner or operator determine that dustcollectors D-1, and D-2 or the associated capture system is not operating normally or as designed, the owner or operator shall follow the response steps specified in Condition C.11. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements

D.1.5 Compliance Determination, Volatile Organic Compound Limitations

To demonstrate compliance with the limits of Condition D.1.1, the owner or operator shall, on a monthly basis, determine the VOC emissions from all VOC containing materials used at Mixing Line 1, utilizing the following equation.

$$\text{Tons VOC} = \text{sum [Tons Material This Month]} * 30 \text{ lb VOC/ton material} * 1/2000 \text{ ton VOC/lb VOC}$$

For the purposes of this Condition, VOC containing material is defined as any materials used at Mixing Line 1 that contains any amount of any carbon compounds other than:

- (a) carbon monoxide,
- (b) carbon dioxide,
- (c) carbonic acid,
- (d) metallic carbides or carbonates,
- (e) ammonium carbonate, and
- (f) any of the following non-photochemically reactive hydrocarbons:
 - (1) Methane (CAS Number 74-82-8),
 - (2) Ethane (CAS Number 74-84-0),
 - (3) 1, 1, 1, trichloroethane (CAS Number 71-55-6),
 - (4) 1, 1, 1, trichloro-2, 2, 2- trifluoroethane (CAS Number 76-13-1),
 - (5) Trichlorofluoromethane (CAS Number 75-69-4),
 - (6) Dichlorodifluoromethane (CAS Number 75-71-8),
 - (7) Chlorodifluoromethane (CAS Number 75-46-7),
 - (8) Trifluoromethane (CAS Number 75-46-7),
 - (9) 1,2, dichloro 1, 1, 2, 2 tetrafluoroethane (CAS Number 132-03-72),
 - (10) Chloropentafluoroethane (CAS Number 76-15-3),
 - (11) 1, 1, 1 trifluoro 2,2 dichloroethane (CAS Number 306-83-2),
 - (12) 1, 1, 1, 2 tetrafluoroethane (CAS Number 811-97-2),
 - (13) 1, 1 dichloro 1 fluoroethane (CAS Number 1717-00-6),
 - (14) 1 chloro 1, 1 difluoroethane (CAS Number 75-68-3),
 - (15) Methylene chloride (CAS Number 75-09-2),
 - (16) 2 chloro 1, 1, 1, 2 tetrafluoroethane (CAS Number 2837-89-0),
 - (17) Pentafluoroethane (CAS Number 354-33-6),
 - (18) 1, 1, 2, 2 tetrafluoroethane (CAS Number 359-35-3),
 - (19) 1, 1, 1 trifluoroethane (CAS Number 420-46-2),
 - (20) 1, 1 difluoroethane (CAS Number 75-37-6),
 - (21) Any perfluorocarbon compounds which fall into the following classes:
 - (A) Cyclic, branched, or linear, completely fluorinated alkanes,
 - (B) Cyclic, branched, or linear, completely fluorinated ethers with no unsaturations,
 - (C) Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations, and
 - (D) Sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine,
 - (22) Parachlorobenzotrifluoride (CAS Number 98-56-6),
 - (23) Cyclic, branched, or linear completely methylated siloxanes, and

(24) Acetone (CAS Number 67-64-1).

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

D.1.6 Compliance Monitoring, VOC Limitations

To demonstrate compliance with the limits of Condition D.1.1, the owner or operator shall record, on a monthly basis, the following for Mixing Line 1:

- (a) the amount of each VOC containing material in tons,
- (b) the total amount VOC containing material in tons, and
- (c) the estimated VOC emissions from the mixing line in tons, as required in Condition D.1.5.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the owner or operator shall maintain for Mixing Line 1, the following records:
 - (1) the amount of each VOC containing material in ton, as recorded pursuant to the requirements of Condition D.1.7,
 - (2) the total amount VOC containing material in tons, as recorded pursuant to the requirements of Condition D.1.7,
 - (3) the estimated VOC emissions from each mixing line in tons, as recorded pursuant to the requirements of Condition D.1.7,
 - (4) Material Safety Data Sheets (MSDS) for all materials used, and
 - (5) purchase orders and invoices of all VOC containing materials used.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

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

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

- (a) One (1) natural gas-fired boiler, identified as BH-5, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr);
- (b) Two (2) natural gas-fired heaters, identified as H-3 and H-4, each will have a heat input capacity of 0.25 MMBtu/hr;
- (c) Space heaters, process heaters, or boilers, with heat input equal to or less than six million (6,000,000) Btu per hour, combusting propane, liquified petroleum gas, or butane;
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (e) Activities including the replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (f) Paved and unpaved roads and parking lots with public access; and
- (g) Blowdown of sight glasses, boilers, compressors, pumps and/or cooling towers.
- (h) One (1) natural gas-fired air makeup unit, identified as AM-1, with a maximum heat input capacity of 0.25 MMBtu/hr.

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2, the PM emissions from boiler BH-5 shall not exceed 0.6 lb PM/MMBtu.

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

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

Source Background and Description

Source Name:	NCP Coatings, Inc.
Source Location:	1413 Clover Road, Mishawaka, IN 46545
County:	St. Joseph
SIC Code:	2851
Operation Permit No.:	141-15583-00196
Operation Permit Issuance Date:	April 2, 2002
Permit Revision No.:	141-19769-00196
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed an application from NCP Coatings, Inc relating to the construction and operation of one (1) natural gas fired air makeup unit, one (1) new paint mixing line (Mix Line #3), and addition of one (1) batch mill and mixer to Mix line #1.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Addition of one (1) 20 liter horizontal small batch mill and mixer to the existing paint Mix Line #1, with particulate matter controlled by existing Torid Dust Collector (D-1).
- (b) One (1) new paint mixing line, identified as Mix Line #3, including two (2) paint mixer tanks, with particulate matter from the mixing line controlled by Torit Dust Collector D-2.
- (c) One (1) natural gas-fired air makeup unit, identified as AM-1, with a maximum heat input capacity of 0.25 MMBtu/hr.

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) MSOP 141-15583-00196, issued on April 9, 2002.
- (b) Notice Only Change 141-16903-00196, issued on January 14, 2003.
- (c) Notice Only Change 141-19416-00196, issued on September 9, 2004.

All conditions from previous approvals were incorporated into this permit.

Justification for the Revision

The MSOP is being modified through a Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-6.1-6(g)(4), as a modification that would have a potential to emit less than twenty five (25) tons per year and greater than five (5) tons per year of PM and PM10.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and 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 October 21, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations, four (4) pages.

Potential to Emit of the Revision Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	5.86
PM-10	5.87
SO ₂	Negl.
VOC	0.00
CO	0.07
NO _x	0.08

HAPs	Potential to Emit (tons/yr)
Hexane	Negl.
Total	Negl.

- (a) The potential to emit of this modification (as defined in 326 IAC 2-6.1-6(g)(4)), of PM and PM₁₀ are each less than 25 tons per year, and greater than 5 tons per year. Therefore, the modification requires a Minor Permit Revision.

- (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 St. Joseph County.

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

- (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. St. Joseph County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) St. Joseph County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	0.27
PM-10	0.27
SO ₂	Negl.
VOC	55.55
CO	0.84
NO _x	1.00
Single HAP	5.39
Combination HAPs	14.96

- (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, 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.

(b) These emissions were based on emission calculations for MSOP 141-15583-00196.

Proposed Modification

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):

	PM (ton/yr)	PM-10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)	Total HAPs (ton/yr)
Proposed Modification	3.00	3.01	0.00	0.00	0.07	0.08	Negl.
Existing Source	0.27	0.27	Negl.	55.55	0.84	1.00	5.39 (single) 14.96 (total)
Total Sourcewide	3.27	3.28	Negl.	55.55	0.91	1.08	5.39 (single) 14.96 (total)
PSD or Offset Threshold Level	< 250	< 250	< 250	< 100	< 250	< 100	< 25

(a) 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 141-19769-00196, 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) The requirements of the New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60), 40 CFR 60.110b, Subpart Kb are not included in this permit for the two (2) Mix Line # 3 Storage Tanks at this source, because each tank has a storage capacity less than seventy-five (75) cubic meters.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in the permit for this revision.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not located in Lake or Porter Counties and is not subject to the Part 70 program. This source is located in St. Joseph County and the potential to emit of all criteria pollutants is less than 100 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)

Since this source was constructed in 1997 and had a potential to emit air pollutants that were less than 250 tons per year, it was an existing minor source under PSD. It is not in 1 of 28 listed source categories. There has been no major modification to the source since its construction, therefore, the source remains a minor source. Therefore, the source is not subject to the provisions of 326 IAC 2-2.

Nonattainment New Source Review (NSR)

This existing source is located in St. Joseph County which was redesignated on June 15, 2004 as a basic nonattainment area for the 8 hour ozone standard. Upon this redesignation, the source still remains a minor source because it has a potential to emit of VOC at less than the nonattainment NSR applicability threshold of 100 tons per year. The sourcewide potential VOC emissions still remain less than 100 tons per year after this permit revision, therefore, this source is not subject to Nonattainment New Source Review.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any source that constructs or reconstructs a major source of HAPs, which has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, must control emissions from that source using technologies consistent with the Maximum Achievable Control Technology (MACT). This source has potential single HAP and total HAP emissions of less than 10 and 25 tons per year, respectively, therefore, this rule does not apply.

State Rule Applicability – Individual Facilities

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

The requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to this facility because the new paint Mix Line #3 does not mix coatings containing VOCs, therefore, there are no VOC emissions as a result of this modification.

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

- (a) The particulate from the one (1) 20 liter horizontal small batch mill and mixer (Mix Line #1) shall be limited by the following:

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:

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

$$E = 4.10 (0.133)^{0.67} = 1.06 \text{ pounds per hour.}$$

The Cartridge Filter system (DC-1) shall be in operation at all times the pigment loading processes are in operation, in order to comply with this limit.

- (b) The particulate from the Mix Line #3 shall be limited by the following:

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:

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

$$E = 4.10 (0.324)^{0.67} = 1.926 \text{ pounds per hour.}$$

The Cartridge Filter system (DC-2) shall be in operation at all times the pigment loading processes are in operation, in order to comply with this limit.

Proposed Changes

1. On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. St. Joseph County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

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

The Permittee owns and operates a paint manufacturing operation.

Authorized individual: ~~Sherman Drew~~ Executive Vice President
Source Address: 1413 Clover Road, Mishawaka, Indiana 46545
Mailing Address: 1413 Clover Road, Mishawaka, Indiana 46545
SIC Code: 2851
Source Location: St. Joseph
County Status: ~~Attainment for PM, SO₂, NO_x, CO~~
~~Maintenance Attainment for VOC~~
Attainment for Ozone under the 1-hr standard
Basic nonattainment for Ozone under the 8-hour standard
Attainment area for all other criteria pollutants
Source Status: Minor Source Operating Permit (MSOP)

2. Condition A.2 has been revised as follows to incorporate the new units.

A.2 Emissions units and Pollution Control Equipment Summary

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

- (a) One (1) paint mixing line, identified as Mix Line #1, including four (4) paint mixer tanks, identified as Mixer #s 6, 7, 8, and 10, **and one (1) 20 liter horizontal small batch mill and mixer**, with particulate matter from the mixing line controlled by Torit Dust Collector D-1;

- (k) Blowdown of sight glasses, boilers, compressors, pumps and/or cooling towers; ~~and~~
(l) One (1) miscellaneous paint drum/can storage area-;

- (m) **One (1) paint mixing line, identified as Mix Line # 3, including two (2) paint mixer tanks, with particulate matter from the mixing line controlled by Torit Dust Collector D-2; and**
- (n) **One (1) natural gas-fired air makeup unit, identified as AM-1, with a maximum heat input capacity of 0.25 MMBtu/hr.**

3. Following changes have been made in Section D.1 to include the additions of batch mill and mixer to Mix Line # 1 and one (1) new Mix Line # 3.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

- (a) One (1) paint mixing line, identified as Mix Line #1, including four (4) paint mixer tanks, identified as Mixer #s 6, 7, 8, and 10, **and one (1) 20 liter horizontal small batch mill and mixer**, with particulate matter from the mixing line controlled by Torit Dust Collector D-1;
- (b) Four (4) submerged filling stations, identified as 1 through 4;
- (c) Four (4) storage tanks, identified as Tank #3; Tank #4; Tank #5; and Tank PG-1, respectively; ~~and~~
- (d) Twelve (12) solvent tote tanks;
- (e) One (1) miscellaneous paint drum/can storage area; **and**
- (f) **One (1) paint mixing line, identified as Mix Line # 3, including two (2) paint mixer tanks, with particulate matter from the mixing line controlled by Torit Dust Collector D-2.**

Emission Limitations and Standards

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) The owner or operator shall limit the particulate matter (PM) from Mixing Line 1 (**Mixer #s 6, 7, 8, and 10**) to 2.44 pounds per hour **based on the following formula.**
- (b) **The owner or operator shall limit the particulate matter (PM) from Mixing Line 1 (one (1) 20 liter horizontal small batch mill and mixer) to 1.06 pounds per hour based on the following formula.**
- (c) **The owner or operator shall limit the particulate matter (PM) from Mix Line # 3 to 1.926 pounds per hour based on the following formula.**

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:

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

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

D.1.3 Control Equipment Standards [326 IAC 6-3-2]

To achieve compliance with the PM limit of Condition D.1.2, the owner or operator shall install ~~baghouse~~ **dustcollectors D-1, and D-2** and its ~~the~~ associated capture system. Said ~~baghouse~~ **dustcollectors** and capture system shall be operated all times when either Mixing Line 1 is in

operation, and shall be operated, at a minimum, at the parameters that achieve compliance with the limits of Condition D.1.2.

Should the owner or operator determine that ~~baghouse~~ **dustcollectors D-1, and D-2** or ~~its~~ **the** associated capture system is not operating normally or as designed, the owner or operator shall follow the response steps specified in Condition C.11. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

4. Section D.2 has been revised as follows to include the new natural gas fired air makeup unit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

- | | |
|-----|---|
| (a) | One (1) natural gas-fired boiler, identified as BH-5, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr); |
| (b) | Two (2) natural gas-fired heaters, identified as H-3 and H-4, each will have a heat input capacity of 0.25 MMBtu/hr; |
| (c) | Space heaters, process heaters, or boilers, with heat input equal to or less than six million (6,000,000) Btu per hour, combusting propane, liquified petroleum gas, or butane; |
| (d) | Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids; |
| (e) | Activities including the replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment; |
| (f) | Paved and unpaved roads and parking lots with public access; and |
| (g) | Blowdown of sight glasses, boilers, compressors, pumps and/or cooling towers. |
| (h) | One (1) natural gas-fired air makeup unit, identified as AM-1, with a maximum heat input capacity of 0.25 MMBtu/hr. |

Conclusion

The construction and operation of the paint Mix Line#3, modification to existing paint Mix Line #1, and addition of natural gas fired air makeup unit, shall be subject to the conditions of the Minor Permit Revision 141-19769-00196.

Appendix A: Emission Calculations

Company Name: NCP Coatings, Inc.
Address City IN Zip: 1413 Clover Road, Mishawaka, Indiana 46545
Permit No.: 141-19769-00196
Reviewer: Adeel Yousuf / EVP
Date: 11/10/04

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Mix Line # 3 New Unit	Mix Line # 1 Addition to Existing Unit	TOTAL
PM	negl.	2.89	2.97	5.86
PM10	0.01	2.89	2.97	5.87
SO2	0.00	0.00	0.00	0.00
NOx	0.08	0.00	0.00	0.08
VOC	negl.	0.00	0.00	0.00
CO	0.07	0.00	0.00	0.07
total HAPs	negl.	0.00	0.00	0.00
worst case single HAP	negl.	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Mix Line # 3 New Unit	Mix Line # 1 Addition to Existing Unit	TOTAL
PM	negl.	0.03	2.97	3.00
PM10	0.01	0.03	2.97	3.01
SO2	0.00	0.00	0.00	0.00
NOx	0.08	0.00	0.00	0.08
VOC	negl.	0.00	0.00	0.00
CO	0.07	0.00	0.00	0.07
total HAPs	negl.	0.00	0.00	0.00
worst case single HAP	negl.	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year.				

**Appendix A: Emissions Calculations
Particulate Matter (PM) Emissions**

Company Name: NCP Coatings, Inc.
Address City IN Zip: 1413 Clover Road, Mishawaka, Indiana 46545
Permit No.: 141-19769-00196
Reviewer: Adeel Yousuf / EVP
Date: 11/10/04

Particulate Emissions from Mix Line #3 Paint Mixing Activities Controlled by Torid Cartridge Filter System (D-2)

PM/PM10: 0.0007 gr/acf outlet x 1100 acf/min x 60 min/hr / 7000 gr/lb x 4.38 ton/yr / lb/hr / 0.01 (1- control efficiency) = **2.89 tons/yr (uncontrolled)**
 where the total control efficiency is listed at 99.00% **0.03 tons/yr (controlled)**

Particulate Emissions from Mix Line #1 due to Addition of 20 Liter Paste Mill and Batch Mixer Controlled by Torid Cartridge Filter System (D-1)

PM/PM10: 0.00072 gr/acf outlet x 1100 acf/min x 60 min/hr / 7000 gr/lb x 4.38 ton/yr / lb/hr / 0.01 (1- control efficiency) = **2.97 tons/yr (uncontrolled)**
 where the total control efficiency is listed at 99.00% **0.03 tons/yr (controlled)**

Methodology

Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control efficiency %)

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

Company Name: NCP Coatings, Inc.
Address City IN Zip: 1413 Clover Road, Mishawaka, Indiana 46545
Permit No.: 141-19769-00196
Reviewer: Adeel Yousuf / EVP
Date: 11/10/04

Heat Input Capacity
MMBtu/hr

0.2

Potential Throughput
MMCF/yr

1.7

One (1) air makeup unit

0.35

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	0.002	0.01	0.00	0.08	0.00	0.07

*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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 100
HAPs Emissions

Company Name: NCP Coatings, Inc.
Address City IN Zip: 1413 Clover Road, Mishawaka, Indiana 46545
Permit No.: 141-19769-00196
Reviewer: Adeel Yousuf / EVP
Date: 11/10/04

HAPs - Organics

	Benzene	Dichlorobenzene	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	1.748E-06	9.986E-07	6.242E-05	1.498E-03	2.829E-06

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	4.161E-07	9.154E-07	1.165E-06	3.162E-07	1.748E-06

4.560E-06

Methodology is the same as previous page.

4.560E-06

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.