



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: August 30, 2006
RE: Fire King International / 043-21052-00026
FROM: Nisha Sizemore
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 03/23/06



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MINOR SOURCE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Fire King International
900 Park Place
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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

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 043-21052-00026	
Issued by: Original signed by Nisha Sizemore, Branch Chief Office of Air Quality	Issuance Date: August 30, 2006 Expiration Date: August 30, 2011

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
B	GENERAL CONDITIONS	6
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Permit Term [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability	
B.5	Severability	
B.6	Property Rights or Exclusive Privilege	
B.7	Duty to Provide Information	
B.8	Certification	
B.9	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13	Permit Renewal [326 IAC 2-6.1-7]	
B.14	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]	
B.15	Source Modification Requirement	
B.16	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] [IC 13-17-3-2][IC 13-30-3-1]	
B.17	Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]	
B.18	Annual Fee Payment [326 IAC 2-1.1-7]	
B.19	Credible Evidence [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS	11
	Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1	Particulate Emission Limitation For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Stack Height [326 IAC 1-7]	
C.6	Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.7	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.8	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.9	Compliance Monitoring [326 IAC 2-1.1-11]	
C.10	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
	Corrective Actions and Response Steps	
C.11	Response to Excursions or Exceedances	
C.12	Actions Related to Noncompliance Demonstrated by a Stack Test	

TABLE OF CONTENTS (Continued)

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]
C.13 Malfunctions Report [326 IAC 1-6-2]
C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]
C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

D.1 EMISSIONS UNIT OPERATION CONDITIONS: Surface Coating and Cleaning..... 17

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
D.1.2 Particulate [326 IAC 6-3-2(d)]
D.1.3 Incinerator [326 IAC 4-2]
D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements [326 IAC 2-1.1-11]
D.1.5 Volatile Organic Compounds (VOC)
D.1.6 VOC Emissions
D.1.7 Afterburner Operation

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]
D.1.8 Record Keeping Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS: Natural Gas Combustion..... 20

Malfunction Report 21

Annual Notification 23

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 fireproof file cabinet manufacturing source.

Authorized Individual: Jim Coyle
Source Address: 900 Park Place, New Albany, Indiana 47150
Mailing Address: 900 Park Place, New Albany, Indiana 47150
Phone Number: 812 - 948 - 8400
SIC Code: 2522
County Location: Floyd
County Status: Nonattainment for 8-hour ozone
Nonattainment for PM2.5
Attainment area for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD, Emission Offset Rules; and 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) One (1) spray painting booth, known as EU17, equipped with an air atomization spray applicator, equipped with dry filters for overspray control, exhausted through Stack 17, installed in 1995, capacity: 1.6 fireproof cabinets per hour.
- (b) One (1) dry powder paint booth, known as powdercoat booth, equipped with an electrostatic spray applicator, equipped with dry filters for overspray control, installed in 1984, capacity: 13.3 fireproof cabinets per hour.
- (c) One (1) controlled pyrolysis cleaning furnace, known as EU33, rated at 0.875 million British thermal units per hour, installed in July 1997, exhausted through Stack 33, capacity: 250 pounds of metal parts per hour, with a maximum of 20 pounds of burn-off waste per hour.
- (d) One (1) drying oven, known as dry powder paint, equipped with an 8,800 cfm exhaust fan, installed in 1984, and capacity: 13.3 fireproof cabinets per hour.
- (e) Six (6) natural gas-fired area heaters, installed in 1978, rated at 0.10 million British thermal units per hour each.
- (f) One (1) natural gas-fired area heater, installed in 1978, rated at 0.25 million British thermal units per hour.
- (g) Three (3) natural gas-fired area heaters, installed in 1978, rated at 0.30 million British thermal units per hour each.
- (h) One (1) natural gas-fired area heater, installed in 1978, rated at 2.50 million British thermal units per hour.

thermal units per hour.

- (i) Six (6) natural gas-fired Co Ray Vac heaters, installed in 1978, rated at 0.04 million British thermal units per hour each.
- (j) Two (2) natural gas-fired water heaters, installed in 1978, rated at 0.005 million British thermal units per hour each.
- (k) One (1) natural gas-fired water heater, installed in 1978, rated at 0.165 million British thermal units per hour.
- (l) One (1) natural gas-fired water heater, installed in 1978, rated at 0.003 million British thermal units per hour.
- (m) Three (3) natural gas-fired cabinet dry ovens, installed in 1978, rated at 3.00 million British thermal units per hour each.
- (n) One (1) natural gas-fired parts washer (stage 1), installed in 1984, rated at 2.50 million British thermal units per hour.
- (o) One (1) natural gas-fired parts washer (stage 3), installed in 1984, rated at 1.75 million British thermal units per hour.
- (p) One (1) natural gas-fired paint bake oven, installed in 1978, rated at 0.50 million British thermal units per hour.
- (q) One (1) natural gas-fired casting dry oven, installed in 1978, rated at 3.00 million British thermal units per hour.
- (r) One (1) natural gas-fired test furnace, installed in 1978, rated at 4.00 million British thermal units per hour.
- (s) One (1) natural gas-fired heated air makeup unit, rated at 5.0 million British thermal units per hour, installed in 1998.

SECTION B GENERAL CONDITIONS

B.1 Definitions [2-41.1-1]

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.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, MSOP 043-21052-00026 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 13-15-3-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice 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, 46204-2251
- (c) 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.10 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) 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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to MSOP 043-21052-00026 and

issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised under 326 IAC 2-7-10.5, or
- (3) deleted under 326 IAC 2-7-10.5.

(b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source/. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
- (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revision are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(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 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(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)]

B.15 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.16 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.17 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 a 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.18 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.19 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 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.6 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 46204-2251

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 [326 IAC 2-9.1-5(a)(2)]

C.7 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 46204-2251

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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, 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.8 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.9 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.10 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.

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.12 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 326 IAC 2-6.1-5(a)(2)]

C.13 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.14 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.15 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 46204-2251

- (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 semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does 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 UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray painting booth, known as EU17, equipped with an air atomization spray applicator, equipped with dry filters for overspray control, exhausted through Stack 17 installed in 1995, capacity: 1.6 fireproof cabinets per hour.
- (b) One (1) dry powder paint booth, known as powdercoat booth, equipped with an electro-static spray applicator, equipped with dry filters for overspray control, installed in 1984, capacity: 13.3 fireproof cabinets per hour.
- (c) One (1) controlled pyrolysis cleaning furnace, known as EU33, rated at 0.875 million British thermal units per hour, installed in July 1997, exhausted through Stack 33, capacity: 250 pounds of metal parts per hour with a maximum of 20 pounds of burn-off waste per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

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 compounds (VOC) content of coating delivered to the applicators in the spray painting booth, known as EU17 shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings.
- (b) 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.

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

- (a) Particulate from the surface coating shall be controlled by a dry particulate filter, or an equivalent control device, 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 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.

D.1.3 Incinerator [326 IAC 4-2]

Pursuant to 326 IAC 4-2-2 (Incinerators: requirements), the one (1) controlled pyrolysis cleaning furnace, known as EU33, shall:

- (a) Consist of primary and secondary chambers or the equivalent;

- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

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 these emission units and any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Conditions 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.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days after the end of each month based on the total volatile organic compound usage for the most recent month.

D.1.7 Afterburner Operation

The afterburner for control shall be in operation at all times when the incineration process is in operation.

Record Keeping and Reporting Requirements

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be complete and sufficient to establish compliance on a monthly basis with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and 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 used added to coatings and those used as cleanup solvents, and

- (2) A log of the dates of use.
- (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements of this permit.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) drying oven, known as dry powder paint, equipped with an 8,800 cfm exhaust fan, installed in 1984, and capacity: 13.3 fireproof cabinets per hour.
- (e) Six (6) natural gas-fired area heaters, installed in 1978, rated at 0.10 million British thermal units per hour each.
- (f) One (1) natural gas-fired area heater, installed in 1978, rated at 0.25 million British thermal units per hour.
- (g) Three (3) natural gas-fired area heaters, installed in 1978, rated at 0.30 million British thermal units per hour each.
- (h) One (1) natural gas-fired area heater, installed in 1978, rated at 2.50 million British thermal units per hour.
- (i) Six (6) natural gas-fired Co Ray Vac heaters, installed in 1978, rated at 0.04 million British thermal units per hour each.
- (j) Two (2) natural gas-fired water heaters, installed in 1978, rated at 0.005 million British thermal units per hour each.
- (k) One (1) natural gas-fired water heater, installed in 1978, rated at 0.165 million British thermal units per hour.
- (l) One (1) natural gas-fired water heater, installed in 1978, rated at 0.003 million British thermal units per hour.
- (m) Three (3) natural gas-fired cabinet dry ovens, installed in 1978, rated at 3.00 million British thermal units per hour each.
- (n) One (1) natural gas-fired parts washer (stage 1), installed in 1984, rated at 2.50 million British thermal units per hour.
- (o) One (1) natural gas-fired parts washer (stage 3), installed in 1984, rated at 1.75 million British thermal units per hour.
- (p) One (1) natural gas-fired paint bake oven, installed in 1978, rated at 0.50 million British thermal units per hour.
- (q) One (1) natural gas-fired casting dry oven, installed in 1978, rated at 3.00 million British thermal units per hour.
- (r) One (1) natural gas-fired test furnace, installed in 1978, rated at 4.00 million British thermal units per hour.
- (s) One (1) natural gas-fired heated air makeup unit, rated at 5.0 million British thermal units per hour, installed in 1998.

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

There are no emission limitations and standards or compliance monitoring requirements specifically applicable to the above emission units.

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865**

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM / PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT RENEWAL
ANNUAL NOTIFICATION**

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

Company Name:	Fire King International, Inc.
Address:	900 Park Place
City:	New Albany, Indiana 47150
Phone #:	812 - 948 - 8400
MSOP Renewal #:	043-21052-00026

I hereby certify that Fire King International is still in operation.
 no longer in operation.

I hereby certify that Fire King International is in compliance with the requirements of MSOP **043-21052-00026**.
 not in compliance with the requirements of MSOP **043-21052-00026**.

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:

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

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

Source Background and Description

Source Name:	Fire King International
Source Location:	900 Park Place, New Albany, Indiana 47150
County:	Floyd
SIC Code:	2522
Operation Permit No.:	043-12142-00026
Operation Permit Issuance Date:	October 10, 2000
Permit Renewal No.:	043-21052-00026
Permit Reviewer:	Gail McGarrity

The Office of Air Quality (OAQ) has reviewed an application from Fire King International relating to the construction and operation of fireproof file cabinet manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) spray painting booth, known as EU17, equipped with an air atomization spray applicator, equipped with dry filters for overspray control, exhausted through Stack 17 installed in 1995, capacity:1.6 fireproof cabinets per hour.
- (b) One (1) dry powder paint booth, known as powdercoat booth, equipped with an electrostatic spray applicator, equipped with dry filters for overspray control, installed in 1984, capacity: 13.3 fireproof cabinets per hour.
- (c) One (1) controlled pyrolysis cleaning furnace, known as EU33, rated at 0.875 million British thermal units per hour, installed in July 1997, exhausted through Stack 33, capacity: 250 pounds of metal parts per hour with a maximum of 20 pounds of burn-off waste per hour.
- (d) One (1) drying oven, known as dry powder paint, equipped with an 8,800 cfm exhaust fan, installed in 1984, capacity: increasing from 6.52 to 13.3 fireproof cabinets per hour.
- (e) Six (6) natural gas-fired area heaters, installed in 1978, rated at 0.10 million British thermal units per hour each.
- (f) One (1) natural gas-fired area heater, installed in 1978, rated at 0.25 million British thermal units per hour.
- (g) Three (3) natural gas-fired area heaters, installed in 1978, rated at 0.30 million British thermal units per hour each.
- (h) One (1) natural gas-fired area heater, installed in 1978, rated at 2.50 million British thermal units per hour.

- (i) Six (6) natural gas-fired Co Ray Vac heaters, installed in 1978, rated at 0.04 million British thermal units per hour each.
- (j) Two (2) natural gas-fired water heaters, installed in 1978, rated at 0.005 million British thermal units per hour each.
- (k) One (1) natural gas-fired water heater, installed in 1978, rated at 0.165 million British thermal units per hour.
- (l) One (1) natural gas-fired water heater, installed in 1978, rated at 0.003 million British thermal units per hour.
- (m) Three (3) natural gas-fired cabinet dry ovens, installed in 1978, rated at 3.00 million British thermal units per hour each.
- (n) One (1) natural gas-fired parts washer (stage 1), installed in 1984, rated at 2.50 million British thermal units per hour.
- (o) One (1) natural gas-fired parts washer (stage 3), installed in 1984, rated at 1.75 million British thermal units per hour.
- (p) One (1) natural gas-fired paint bake oven, installed in 1978, rated at 0.50 million British thermal units per hour.
- (q) One (1) natural gas-fired casting dry oven, installed in 1978, rated at 3.00 million British thermal units per hour.
- (r) One (1) natural gas-fired test furnace, installed in 1978, rated at 4.00 million British thermal units per hour.
- (s) One (1) natural gas-fired heated air makeup unit, rated at 5.0 million British thermal units per hour, installed in 1998.

New Emission Units and Pollution Control Equipment

There are no new facilities proposed at this source during this review process.

Emission Units and Pollution Control Equipment Removed From Source

Note One (1) natural gas-fired dry bake oven, installed in 1978, rated at 0.50 million British thermal units per hour has been removed from the source.

Existing Approvals

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

- (a) CP 043-4178-00026, issued on July 3, 1995
- (b) CP 043-8652-00026, issued on August 27, 1997.
- (c) MSOP 043-12142-00026, issued October 10, 2000.
- (d) First Notice Only Change 043-19354-00026

All conditions from previous approvals were incorporated into this permit.

Air Pollution Control Justification as an Integral Part of the Process

Pursuant to CP 043-8652-00026 issued August 27, 1997, the company submitted the following justification such that the afterburner is considered as an integral part of the incineration process:

The furnace contains a single chamber with a direct flame afterburner, which is an integral part of the furnace design.

IDEM, OAQ evaluated the justifications and agreed that the afterburner will be considered as an integral part of the incineration process. Therefore, the permitting level will be determined using the potential to emit after the afterburner. Operating conditions in the proposed permit will specify that this afterburner shall operate at all times when the incineration process is in operation.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
17	Paint Booth	22.3	2.00	9,300	ambient
18	Curing Oven	17.5	0.42	3,850	150 - 160
33	Pyrolysis Oven	22.0	1.17	1,100 - 1,600	1,400 - 1,600

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on April 8, 2005.

Emission Calculations

See Appendix A pages 1 through 5 of this document for detailed emissions calculations. Note: Pages 1, 2 and 5 are directly from MSOP 043-12142-00026. Pages 3 and 4 are updated to show the removal of the natural gas dry bake oven.

Potential to Emit From the Entire Source

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, and IDEM, OAQ.

Pollutant	Potential To Emit (tons/year)
PM	97.9
PM ₁₀	98.6
SO ₂	0.192
VOC	25.1
CO	11.7
NO _x	13.6
Most Significant HAP (Toluene)	4.32
Total HAPs	4.61

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM₁₀ are equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ mission data.

Pollutant	Actual Emissions (tons/year)
PM	0.2052
PM ₁₀	0.2052
PM 2.5	0.2052
SO ₂	0.0162
VOC	0.3885
CO	2.268
NO _x	2.7

No previous HAPs emission data have been received from the source.

County Attainment Status

The source is located in Floyd County.

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

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides 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 nonattainment new source review.
- (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 – Entire Source section.
- (c) Floyd County has been classified as attainment or unclassifiable for all 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.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

- (a) each criteria pollutant is less than one hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) any combination of HAPS is less than twenty-five (25) tons/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. The New Performance Standards for Incinerators (40 CFR 60 Subpart E) is not included in this permit for the pyrolysis cleaning furnace, known as EU33, because the paint residues being combusted do not meet the definition of solid waste as defined by 40 CFR Part 60.51(b).
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), for Hazardous Waste Combustors, 40 CFR 63 Subpart EEE, are not included in this permit for the pyrolysis cleaning furnace because the cleaning furnace is

an industrial furnace process which is exempt for this rule. The furnace cleans the metal which is then used in product manufacturing.

State Rule Applicability - Entire Source

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. Fire King International has a limited potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-3 does not apply.

326 IAC 2-6 (Emission Reporting)

Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement is removed from the permit.

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 4-2 (Incinerators)

The one (1) controlled pyrolysis cleaning furnace, known as EU33, which emits regulated pollutants shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

- (h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray painting booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for 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.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

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

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes for Surface Coating) became effective; this rule was previously referred to as 326 IAC 6-3-2(c) (Process Operations). Conditions D.1.2, D.1.7, D.1.9 have been removed from the permit, and a new condition D.1.2 has been added to the permit which incorporates the 326 IAC 6-3 revisions that became effective on June 12, 2002.

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

326 IAC 8-3-3 (Open Top Vapor Degreaser Operation)

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

The two (2) parts washers are not subject to these rules since they do not use solvents. They use either Sodium Hydroxide and Sodium Silicate or Ammonium Bifluoride and Hydroxylamine Sulfate.

326 IAC 20-6 (Halogenated Solvent Cleaning)

The two (2) parts washers are not subject to this rule which incorporates the requirements of 40 CFR 63 Subpart T.

Conclusion

The operation of this fireproof file cabinet manufacturing source shall be subject to the conditions of the attached proposed Minor Source Operating Permit 043-21052-00026.

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

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

Source Background and Description

Source Name:	Fire King International
Source Location:	900 Park Place, New Albany, Indiana 47150
County:	Floyd
SIC Code:	2522
Operation Permit No.:	043-12142-00026
Operation Permit Issuance Date:	October 10, 2000
Permit Renewal No.:	043-21052-00026
Permit Reviewer:	Gail McGarrity

On July 5, 2006, the Office of Air Quality (OAQ) had a notice published in the New Albany Tribune New Albany, stating that Fire King International, Inc. had applied for a Minor Source Operating Permit (MSOP) to operate a stationary fireproof file cabinet 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 July 28, 2005, Evelyn Crooks of Environmental Compliance Source, Ltd. Submitted comments on behalf of Fire King International, Inc. 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

Condition C.15(c) references a semi-annual report "if required in Section D of this permit." None of the terms and conditions in Section D requires a semi-annual report, but the form was included as page 24 of 24. FireKing International requests that the form be deleted from the permit so that the reporting requirements will be consistent with the MSOP issued to our sister company FireKing Security Products (M043-19238-00043).

Response to Comment 1

IDEM agrees that the report on page 24 of MSOPM043-21052-00026 can be deleted, since there is no compliance monitoring report requirement in the Section D of this permit and to be consistent with the permit for FireKing Security Products. The permit is revised as follows:

~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION~~

~~MINOR SOURCE OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT~~

Source Name: ~~Fire King International~~
Source Address: ~~900 Park Place, New Albany, Indiana 47150~~

Mailing Address: 900 Park Place, New Albany, Indiana 47150
MSOP #: 043-21052-00026

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Comment 2

The language in Condition D.1.6 is confusing regarding the date on which the demonstration of compliance is due. We respectfully insist that it be changed to: "Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month." Demonstration of compliance at the end of each day is an unnecessary burden and would not contribute to the accuracy of the recordkeeping or reporting of VOC usage at this facility.

Response to Comment 2

IDEM agrees that the language in D.1.6 needs to be clear and consistent. Since the coatings used in the paint booth are compliant with the 3.5 pounds of VOC per gallon of coating less water, the Permittee can maintain records of the amount, VOC content, and dates used during the month of the coatings and solvents to demonstrate compliance at the end of each month with the VOC limits established in Condition D.1.1. The permit is revised as follows:

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days ~~of~~ **after** the end of each ~~day-month~~ based on the total volatile organic compound usage for the most recent month.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes. Miscellaneous grammar and spelling corrections have been made throughout the permit also.

Change 1:

Upon further review, IDEM has determined the requirement in Condition D.1.7 Afterburner Operation is a requirement to be listed under Compliance Determination. Therefore, the permit is revised as follows:

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

D.1.7 Afterburner Operation

The afterburner for control shall be in operation at all times when the incineration process is in operation.

Change 2:

The requirement to maintain records taken daily is deleted, because there is no daily VOC limitation in section D.1. A requirement to maintain records sufficient to demonstrate compliance with the VOC usage and limits in Condition D.1.1 on a monthly basis is added.

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection record keeping in the applicable preventive maintenance plan. The requirement in Condition D.1.8(b) to keep records of preventive maintenance plans is removed.

The permit is revised as follows:

Record Keeping and Reporting Requirements

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be ~~taken daily and shall be~~ complete and sufficient to establish compliance **on a monthly basis** with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and 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 used added to coatings and those used as cleanup solvents, and

(2) A log of the dates of use.

~~(b) To document compliance with Condition D.1.4, the Permittee shall maintain records of~~

~~any 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.

Change 3:

The name of the Office of Air Management changed since the first MSOP was issued in 2000. Also, the Office of Air Quality facsimile number has changed. The reporting forms are updated to reflect the name and facsimile number changes. The permit is revised as follows:

OFFICE OF AIR MANAGEMENT QUALITY

Fax: 317-233-5967 6865

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Conditions 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, ~~OAM~~ **OAQ**, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Fire King International, Inc.
Address City IN Zip: 900 Park Avenue, New Albany, IN 47150
MSOP Renewal : 043-21052
Plt ID: 043-00026
Reviewer: Gail McGarrity
Date: 28-Jun-05**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Spray Painting Booth, EU-17																
Polane HS	10.41	32.90%	0.0%	32.9%	0.0%	60.35%	1.00000	1.600	3.42	3.42	5.48	131.52	24.00	24.48	5.68	50%
Solvent Blend	6.99	100.00%	0.0%	100.0%	0.0%	0.00%	73.61345	0.00011	6.99	6.99	0.06	1.41	0.26	0.00	n/a	100%
Dry Powder Paint Booth																
VEDOC	13.60	0.00%	0.0%	0.0%	0.0%	100.00%	0.36765	13.300	0.00	0.00	0.00	0.00	0.00	72.82	0.00	75%

State Potential Emissions	Add worst case coating to all solvents	PM	Control Efficiency	95.00%												
			Uncontrolled		5.54	132.93	24.26	97.29								
			Controlled		5.54	132.93	24.26	1.22								

METHODOLOGY

Note Solvent blend usage scaled from 1 gallon per week to potential usage of 73.61 gallons per year
Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Fire King International, Inc.
Address City IN Zip: 900 Park Avenue, New Albany, Indiana 47150
MSOP Renewal : 043-21052
Plt ID: 043-00026
Reviewer: Gail McGarrity
Date: 28-Jun-05

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %							Toluene	
				Toluene	Toluene						Diisocyanate Emissions (tons/yr)	Toluene Emissions (tons/yr)
				Diisocyanate								
Polane HS Plus Enamel Base	11.60	1.00000	1.600	0.00%	5.00%						0.000	4.06
Catalyst V66V44	9.32	0.11167	0.875	0.60%	0.00%						0.024	0.00
Reducer R6K30	6.76	0.11167	0.875	0.00%	0.00%						0.000	0.00
Solvent Blend	6.99	73.61	0.00011	0.00%	100.00%						0.000	0.26
Individual Total											0.024	4.322
Overall Total											4.346	

METHODOLOGY

Solvent Blends composes of unspecified weights of HAPs: toluene, xylene, and methyl alcohol, assumed 100% toluene (worst case)

HAPS emission rate (tons/yr) = Density (lbs/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

Small Industrial Combustion Units

Company Name: Fire King International, Inc.

Address City IN Zip: 900 Park Avenue, New Albany, IN 47150

MSOP Renewal : 043-21052

Pit ID: 043-00026

Reviewer: Gail McGarrity

Date: 28-Jun-05

Pyrolysis Furnace	0.875
Air Make-up Unit	5.000
6 Area Heaters @0.1 ea	0.600
Area Heater	0.250
Area Heater	0.300
Area Heater	2.500
6 Ray Vac Heater @0.04 ea	0.240
2 Water Heaters @0.005 ea	0.010
Water Heater	0.165
Water Heater	0.003
3 Cabinet Dry Ovens @ 3.0 ea	9.000
Stage Parts Washer	2.500
Stage Parts Washer	1.750
Paint Bake Oven	0.500
Casting Dry Oven	3.000
Test Furnace	4.000
Total	30.693

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr
30.693	268.87

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.255	1.022	0.081	13.444	0.739	11.293

*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

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Combustion Units

HAPs Emissions

Company Name: Fire King International, Inc.

Address City IN Zip: 900 Park Avenue, New Albany, IN 47150

MSOP Renewal: 043-21052

Plt ID: 043-00026

Reviewer: Gail McGarrity

Date: 28-Jun-05

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	2.823E-04	1.613E-04	1.008E-02	2.420E-01	4.571E-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	6.722E-05	1.479E-04	1.882E-04	5.109E-05	2.823E-04

Methodology is the same as page 3.

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

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Incinerator**

Company Name: Fire King International, Inc.
Address City IN Zip: 900 Park Avenue, New Albany, IN 47150
MSOP Renewal : 043-21052
Plt ID: 043-00026
Reviewer: Gail McGarrity
Date: 28-Jun-05

THROUGHPUT lbs/hr 20

THROUGHPUT
tons/yr
87.6

Emission Factor in lb/ton	POLLUTANT				
	PM	SO2	CO	VOC	NOX
7.0	2.5	10.0	3.0	3.0	
Potential Emissions in ton/yr	0.307	0.110	0.438	0.131	0.131

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers

Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)