



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
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(800) 451-6027
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TO: Interested Parties / Applicant
DATE: July 26, 2006
RE: D & L Industrial Finishes, Inc. / 161-22514-00001
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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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) AND NEW SOURCE
REVIEW (NSR)
OFFICE OF AIR QUALITY**

**D&L Industrial Finishes, Inc.
215 Brownsville Avenue,
Liberty, Indiana 47353**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F161-22514-00001	
Issued by: Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 26, 2006 Expiration Date: July 26, 2011

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 2-8-3(b)]

The Permittee owns and operates a stationary paint manufacturing process.

Authorized individual:	Plant Manager
Source Address:	215 Brownsville Avenue, Liberty, Indiana 47353
Mailing Address:	215 Brownsville Avenue, Liberty, Indiana 47353
General Source Phone:	(765) 458-5157
SIC Code:	2851
Source Location Status:	Union
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) The Grinding process consist of following units, constructed in 1989:

Emission Unit ID	Mill Description	Max. Capacity (gallons)	Stack ID
RM-01	Roller Mill	10	V-6
9P-01	Sand Mill	9	V-6
9P-02	Sand Mill	9	V-6
9P-03	Sand Mill	9	V-6
3P-01	Sand Mill	3	V-6
3P-02	Sand Mill	3	V-6
3P-03	Sand Mill	3	V-6
33I-01	Sand Mill	8.72	V-6
33I-02	Sand Mill	8.72	V-6
33I-03	Sand Mill	8.72	V-6
BM-01	Ball Mill	369	V-2
BM-02	Ball Mill	216	V-3
BM-03	Ball Mill	309	V-3
BM-04	Ball Mill	309	V-3

(b) The batch maker process consist of following units, , constructed in 1989:

Emission Unit ID	Mixer Description	Max. Capacity (gallons)	Stack ID
AM-01	Air Mixer	590	V-12

AM-02	Air Mixer	550	V-12
AM-03	Air Mixer	440	V-12
AM-04	Air Mixer	330	V-12
AM-05	Air Mixer	300	V-12
AM-06	Air Mixer	275	V-12
AM-07	Air Mixer	275	V-12
AM-08	Air Mixer	250	V-12
AM-09	Air Mixer	250	V-6
AM-10	Air Mixer	220	Ventilation
SM-01	Shar Mixer	220	V-6
SM-02	Shar Mixer	220	V-5
SM-03	Shar Mixer	220	V-5
SM-04	Shar Mixer	220	V-5
SM-05	Shar Mixer	220	V-5
SM-06	Shar Mixer	220	V-6
SM-07	Shar Mixer	180	V-6
SM-08	Shar Mixer	170	V-6
SM-09	Shar Mixer	165	V-6
SM-10	Shar Mixer	4500	V-5

Emission Unit ID	Tank Description	Max. Capacity (gallons)	Stack ID
ST-01	Stationary Mixer Tank	4500	Ventilation
ST-02	Stationary Mixer Tank	4500	Ventilation
ST-03	Stationary Mixer Tank	2250	V-10
ST-04	Stationary Mixer Tank	2250	V-10
ST-05	Stationary Mixer Tank	1500	V-10
ST-06	Stationary Mixer Tank	1500	V-10
ST-07	Stationary Mixer Tank	2800	V-10
ST-08	Stationary Mixer Tank	1500	V-10
ST-09	Stationary Mixer Tank	2800	V-10
ST-10	Stationary Mixer Tank	2800	V-10
ST-11	Stationary Mixer Tank	700	V-9
ST-12	Stationary Mixer Tank	700	V-9
ST-13	Stationary Mixer Tank	700	V-9
ST-14	Stationary Mixer Tank	700	V-9
ST-15	Stationary Mixer Tank	866	V-9
ST-16	Stationary Mixer Tank	866	V-9
ST-17	Stationary Mixer Tank	1500	V-9
ST-18	Stationary Mixer Tank	2800	V-9
ST-19	Stationary Mixer Tank	750	V-9
ST-20	Stationary Mixer Tank	750	V-9

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired furnace that is used to heat the building with heat input equal to or less than ten (10) million BTU per hour;

- (b) Laboratory activities consists of:
 - (1) Two (2) part washers that use a solvent with a vapor pressure equal to or less than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three tenths (0.3) pound per square inch) measured at thirty-eight degrees Centigrade (38°C) (one hundred (100) degrees Fahrenheit); or (ii) having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty degrees Centigrade (20°C) (sixty-eight (68) degrees Fahrenheit); and which use less than one hundred forty-five (145) gallons per twelve (12) months.
 - (2) Two small (2) paint booths coating metal and wood with electric drying ovens used for testing purposes.
- (c) Other categories with emissions below significant thresholds (i.e. less than 3 pounds per hour VOC):
 - (1) Equipment cleaning operations with potential to emit less than 10 tons per year of VOC; and
 - (2) Eight (8) storage tanks with capacity equal to 2,000 gallons and six (6) storage tanks with capacity equal to 2,400 gallons.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

- (a) This permit, FESOP 161-22514-00001, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, 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, until the renewal permit has been issued or denied.

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 [326 IAC 2-8-6]

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 [326 IAC 2-8-4(4)]

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 [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (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 the "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 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 the "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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 161-22514-00001 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "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, IN 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months 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 2-8 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.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][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 FESOP 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 the conditions of this permit;
- (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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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

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

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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 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.7 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.

C.8 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) 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. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 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.10 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 [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 facility 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 retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be 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.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) The Grinding process consists of following units, constructed in 1989:

Emission Unit ID	Mill Description	Max. Capacity (gallons)	Stack ID
RM-01	Roller Mill	10	V-6
9P-01	Sand Mill	9	V-6
9P-02	Sand Mill	9	V-6
9P-03	Sand Mill	9	V-6
3P-01	Sand Mill	3	V-6
3P-02	Sand Mill	3	V-6
3P-03	Sand Mill	3	V-6
33I-01	Sand Mill	8.72	V-6
33I-02	Sand Mill	8.72	V-6
33I-03	Sand Mill	8.72	V-6
BM-01	Ball Mill	369	V-2
BM-02	Ball Mill	216	V-3
BM-03	Ball Mill	309	V-3
BM-04	Ball Mill	309	V-3

(b) The batch maker process consists of following units, constructed in 1989:

Emission Unit ID	Mixer Description	Max. Capacity (gallons)	Stack ID
AM-01	Air Mixer	590	V-12
AM-02	Air Mixer	550	V-12
AM-03	Air Mixer	440	V-12
AM-04	Air Mixer	330	V-12
AM-05	Air Mixer	300	V-12
AM-06	Air Mixer	275	V-12
AM-07	Air Mixer	275	V-12
AM-08	Air Mixer	250	V-12
AM-09	Air Mixer	250	V-6
AM-10	Air Mixer	220	Ventilation
SM-01	Shar Mixer	220	V-6
SM-02	Shar Mixer	220	V-5
SM-03	Shar Mixer	220	V-5
SM-04	Shar Mixer	220	V-5
SM-05	Shar Mixer	220	V-5
SM-06	Shar Mixer	220	V-6
SM-07	Shar Mixer	180	V-6
SM-08	Shar Mixer	170	V-6
SM-09	Shar Mixer	165	V-6
SM-10	Shar Mixer	4500	V-5

Emission Unit ID	Tank Description	Max. Capacity (gallons)	Stack ID
ST-01	Stationary Mixer Tank	4500	Ventilation
ST-02	Stationary Mixer Tank	4500	Ventilation
ST-03	Stationary Mixer Tank	2250	V-10
ST-04	Stationary Mixer Tank	2250	V-10
ST-05	Stationary Mixer Tank	1500	V-10
ST-06	Stationary Mixer Tank	1500	V-10
ST-07	Stationary Mixer Tank	2800	V-10
ST-08	Stationary Mixer Tank	1500	V-10
ST-09	Stationary Mixer Tank	2800	V-10
ST-10	Stationary Mixer Tank	2800	V-10
ST-11	Stationary Mixer Tank	700	V-9
ST-12	Stationary Mixer Tank	700	V-9
ST-13	Stationary Mixer Tank	700	V-9
ST-14	Stationary Mixer Tank	700	V-9
ST-15	Stationary Mixer Tank	866	V-9
ST-16	Stationary Mixer Tank	866	V-9
ST-17	Stationary Mixer Tank	1500	V-9
ST-18	Stationary Mixer Tank	2800	V-9
ST-19	Stationary Mixer Tank	750	V-9
ST-20	Stationary Mixer Tank	750	V-9

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

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

D.1.1 Solvent and Pigment Usages [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 8-1-6] [40 CFR 63 Subpart FFFF and Subpart HHHHH]

- (a) The total solvent usage in paint manufacturing facilities shall be limited to 1,450,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions of 24.65 tons per twelve (12) consecutive month period, based on the AP-42 emission factor of 0.034 lb/lb of solvent used.
- (b) The maximum single HAP emissions shall not exceed 0.0137 lb HAP/lb of solvent. This HAP content limit, in conjunction with the solvent usage limit in (a), is equivalent to limiting single HAP and total HAP emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, based on the above mentioned VOC emission factor.
- (c) The total pigment usage in paint manufacturing facility shall be limited to 1,792,135 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to 8.96 tons of PM/PM₁₀ per twelve (12) consecutive month period, based on the AP-42 emission factor of 20 lb/ton of pigment used.

Compliance with above usage limitations shall limit the source-wide VOC and PM/PM₁₀, emissions to less than 25 and 100 tons per twelve (12) consecutive month period, respectively; and single HAP, and total HAPs emission to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) and 40 CFR 63 (NESHAP) does not apply. Compliance with Condition D.1.1(a) shall render 326 IAC 8-1-6 not applicable and compliance with Conditions D.1.1(a) and D.1.1(c) shall render 326 IAC 2-2 not applicable.

D.1.2 Particulate Emission Limitations [326 IAC 6-3-2(c)]

The PM from the following emission units shall not exceed the pound per hour emission rate established in the following table:

These emissions limitations were calculated using the following equation.

Emission Unit	Maximum Pigments Usage, lbs/yr	Maximum Pigments Usage, lbs/hr	Allowable PM Emission Rate in lbs/hr
Air Mixer-01	593,041.60	1,624.77	3.57
Air Mixer-02	552,835.39	1,514.62	3.40
Shar Mixer -10	4,523,198.63	12,392.33	13.92
Stationary Mix Tank -01	4,523,198.63	12,392.33	13.92
Stationary Mix Tank -02	4,523,198.63	12,392.33	13.92
Stationary Mix Tank -03	2,261,599.31	6,196.16	8.75
Stationary Mix Tank -04	2,261,599.31	6,196.16	8.75
Stationary Mix Tank -05	1,507,732.88	4,130.78	6.67
Stationary Mix Tank -06	1,507,732.88	4,130.78	6.67
Stationary Mix Tank -07	2,814,434.70	7,710.78	10.13
Stationary Mix Tank -08	1,507,732.88	4,130.78	6.67
Stationary Mix Tank -09	2,814,434.70	7,710.78	10.13
Stationary Mix Tank -10	2,814,434.70	7,710.78	10.13
Stationary Mix Tank -11	703,608.68	1,927.70	4.00
Stationary Mix Tank -12	703,608.68	1,927.70	4.00
Stationary Mix Tank -13	703,608.68	1,927.70	4.00
Stationary Mix Tank -14	703,608.68	1,927.70	4.00
Stationary Mix Tank -15	870,464.45	2,384.83	4.61
Stationary Mix Tank -16	870,464.45	2,384.83	4.61
Stationary Mix Tank -17	1,507,732.88	4,130.78	6.67
Stationary Mix Tank -18	2,814,434.70	7,710.78	10.13
Stationary Mix Tank -19	753,866.44	2,065.39	4.19
Stationary Mix Tank -20	753,866.44	2,065.39	4.19

Interpolation and extrapolation 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:

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

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

D.1.4 Volatile Organic Compounds (VOC) and Hazard Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content, HAPs content and solvent usage 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) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, the Permittee shall maintain records of in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the solvent and pigment usage limits and the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount of VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) The volume weighed VOC and HAPs content of the coatings used for each month;
- (3) The total VOC and HAPs usage for each month;
- (4) The weight of VOC and HAPs emitted for each compliance period; and
- (5) The weight of pigment used.

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

D.1.6 Reporting Requirements

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: **D&L Industrial Finishes, Inc.**
Source Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
Mailing Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
FESOP No.: **161-22514-00001**

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: **D&L Industrial Finishes, Inc.**
Source Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
Mailing Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
FESOP No.: **161-22514-00001**

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: **D&L Industrial Finishes, Inc.**
Source Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
Mailing Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
FESOP No.: **161-22514-00001**
Facility: **Paint Manufacturing Operation**
Parameter: **Solvent Usage in pounds per twelve (12) consecutive month period**
Limit: **1,450,000 lbs of solvent per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.**

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: **D&L Industrial Finishes, Inc.**
Source Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
Mailing Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
FESOP No.: **161-22514-00001**
Facility: **Paint Manufacturing Operation**
Parameter: **Pigment Usage in pounds per twelve (12) consecutive month period**
Limit: **179,213.5 lbs of pigment per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.**

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: **D&L Industrial Finishes, Inc.**
Source Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
Mailing Address: **215 Brownsville Avenue, Liberty, Indiana 47353**
FESOP No.: **161-22514-00001**

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit

Source Name:	D&L Industrial Finishes, Inc.
Source Location:	215 Brownsville Avenue, Liberty, Indiana 47353
County:	Union
SIC Code:	2851
Permit Number:	161-22514-00001
Permit Reviewer:	KSR / EVP

On January 13, 2006, the Office of Air Quality (OAQ) had a notice published in the Liberty Herald, Liberty, Indiana, stating that D&L Industrial Finishes, Inc. had applied for a Federally Enforceable Source Operating Permit (FESOP) to operate a paint manufacturing facility. The notice also stated that OAQ proposed to issue a permit 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 May 5, 2006, Leigh Anne Harvey, Project Manager at D&L Industrial Finishes, Inc. submitted comments on the proposed FESOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

In Section A.1: Please change the authorized individual from ~~Gwayne Reed~~ to Plant Manager.

Response 1

The following change has been made to Section A.1 as requested.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary paint manufacturing process.

Authorized individual:	Gwayne Reed Plant Manager
Source Address:	215 Brownsville Avenue, Liberty, Indiana 47353

Comment 2

In Section A.3: Please add the following insignificant activities: laboratory activities used to conduct quality assurance test of the manufactured paint. Specifically, the laboratory activities consist of two small paint application booths with electric drying ovens and two small parts washers that use a solvent with a vapor pressure equal to or less than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three tenths (0.3) pound per square inch) measured at thirty-eight degrees Centigrade (38°C) (one hundred (100) degrees Fahrenheit); or (ii) having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty degrees Centigrade (20°C) (sixty-eight (68) degrees Fahrenheit); and which use less than one hundred forty-five (145) gallons per twelve (12) months.

Equipment cleaning operations with the potential to emit less than 10 tons per year of VOC. Based on actual emissions from cleaning operations, the potential to emit from this process is estimated to be 6.74 tons per year of VOC.

Above ground storage tanks: eight (8) 2,000-gallon storage tanks located on the west side of the facility and six (6) 2,400-gallon storage tanks located inside on the west side of the facility.

Response 2

Following insignificant activities have been added to Section A.3 of the permit.

1. Two (2) small paint booths are used for testing purposes and coat metal and wood products and emit negligible amount of VOC emissions.
2. The two (2) parts washers have potential VOC emissions of 0.98 tons per year and negligible HAP emissions as shown in table below. As a result of this change, the source wide potential VOC emissions will change from 24.65 to 25.63 tons per year.

Pollutant	VOC Content (lb VOC/gal)	Maximum Usage (gal/yr)	Uncontrolled Potential VOC Emissions (ton/yr)	Xylene		Ethyl Benzene	
				%	TPY	%	TPY
VOC	6.71	145	0.49	3.00%	0.01	0.86%	0.00

3. Other categories with emissions below significant thresholds (i.e. less than 3 pounds per hour VOC):
 - (1) Equipment cleaning operations with potential to emit less than 10 tons per year of VOC; and
 - (2) Eight (8) storage tanks with capacity equal to 2,000 gallons and six (6) storage tanks with capacity equal to 2,400 gallons.

The requirements of National Emission Standards for Hazardous Air Pollutants, Subpart M (Miscellaneous Metal Parts and Products), 40 CFR 63 are not included in the permit for the two (2) paint booths because the source is not a major source of HAP. The potential of emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.

The requirements of the National Emission Standards for Hazardous Air Pollutants for surface coating of wood building products, 326 IAC 20 (40 CFR Part 63.4680, Subpart QQQQ) is not included in the permit for the two (2) paint booths because the source is not a major source of HAPs. The potential to emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.

The requirements of the National Emission Standards for Halogenated Solvent Cleaning, Subpart T, 40 CFR 63 are not included in the permit for the two (2) parts washers because the source does not use any regulated halogenated solvents in the degreasing operation.

The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels Constructed, Reconstructed or Modified after July 23, 1984, (326 IAC 12, 40 CFR 60, Subpart Kb), are not included in this permit for the above ground diesel storage tanks. These storage tanks each have a capacity less than 75 cubic meters.

The following changes have been made to Condition A.3 as requested.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired furnace that is used to heat the building with heat input equal to or less than ten (10) million BTU per hour;
- (b) **Laboratory activities consists of:**

- (1) **Two (2) part washers that use a solvent with a vapor pressure equal to or less than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three tenths (0.3) pound per square inch) measured at thirty-eight degrees Centigrade (38°C) (one hundred (100) degrees Fahrenheit); or (ii) having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty degrees Centigrade (20°C) (sixty-eight (68) degrees Fahrenheit); and which use less than one hundred forty-five (145) gallons per twelve (12) months.**
 - (2) **Two small (2) paint booths coating metal and wood with electric drying ovens used for testing purposes.**
- (c) **Other categories with emissions below significant thresholds (i.e. less than 3 pounds per hour VOC:**
- (1) **Equipment cleaning operations with potential to emit less than 10 tons per year of VOC; and**
 - (2) **Eight (8) storage tanks with capacity equal to 2,000 gallons and six (6) storage tanks with capacity equal to 2,400 gallons.**

Comment 3

In Section D.1.1 (c): Please increase the total pigment usage limitation. The current limit is greater than an order of magnitude below the allowable limitation and is overly restrictive. Please increase this limit to 1,792,135 pounds of pigment per 12-month rolling period.

Response 3

Increasing the pigment usage from 179,213.5 to 1,792,135 pounds per twelve (12) consecutive month period will result in total of 8.96 tons of PM/PM₁₀ emissions from Paint Mixing and Blending operation, which is still less than the previous permitted limit of 99 tons per year of PM/PM₁₀. This change will not trigger any other rule applicability for this operation.

The following changes have been made to Condition D.1.1 as requested.

D.1.1 Solvent and Pigment Usages [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 8-1-6] [40 CFR 63 Subpart FFFF and Subpart HHHHH]

**

- (c) The total pigment usage in paint manufacturing facility shall be limited to ~~479,213.5~~ **1,792,135** pounds per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to ~~0.9~~ **8.96** tons of PM/PM₁₀ per twelve (12) consecutive month period, based on the AP-42 emission factor of 20 lb/ton of pigment used.

Comment 4

In Section D.1.4: Since the facility does not apply coatings, 326 IAC 8-1-4 is not applicable. Please remove this section.

Response 4

The requirements of 326 IAC 8-1-4 are included in the permit as a procedure to determine the VOC and HAP content of the materials used at the source. This condition is required to demonstrate compliance with emission limits in Condition D.1.1.

Comment 5

In Section D.1.5 (a) (1) and (2): Please remove both of these record keeping requirements. There are no limits of the VOC content of the materials we manufacture; only the total amount of solvent and HAP used. Section D-1-6 (a) (3), (4) and (5) will provide all of the information required to demonstrate compliance with the usage and emission limitations in Section D.1.1.

Response 5

Condition D.1.5(b) includes a limit on HAP content, therefore Conditions D.1.5(a)(1) and (a)(2) are required to demonstrate compliance with the condition. Although there is no VOC content limit, this information is indirectly used to determine the VOC emissions from the facility since the VOC is equal to HAPs. Therefore, the record keeping requirement in Condition D.1.5(a)(1) and (a)(2) will remain in the permit. No change has been made as a result of this comment.

Upon further consideration, IDEM, OAQ has decided to make changes to the permit as indicated below. Any permit changes affecting the permit's Table of Contents are also revised without replication herein.

1. A decision has been made to move the Permit No Defense condition to the cover page.

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 FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F161-22514-00001	
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

2. Upon further review, IDEM has decided to include the following updates to further address and clarify the permit term and the term of the conditions. This includes the addition of the condition: Term of Conditions [326 IAC 2-1.1-9.5] and changes to the following conditions: Permit Term.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

- (a)** This permit, **FESOP 161-22514-00001**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date **of this permit**.

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

- (b) 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, until the renewal permit has been issued or denied.**

3. Condition B.9 (Annual Compliance Certification) is being revised to remove "in letter form" so that it does not contradict the IDEM's guidance.

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted ~~in letter form~~ no later than July 1 of each year to:

4. The phone number and the fax number listed in Emergency Provisions has been changed so that the OAQ's receptionist number is listed and the fax number for the compliance branch is listed.

B.11 Emergency Provisions [326 IAC 2-8-12]

(b)...

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: ~~317-233-5674~~ **317-233-0178**(ask for Compliance Section)
Facsimile Number: ~~317-233-5967~~ **317-233-6865**

5. The rule cites for the Part 70 Operating Sources has been removed from (a) in the Prior Permits Superseded condition for FESOPs.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 161-22514-00001 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 revised, or~~
(3) ~~deleted under 326 IAC 2-7-10.5. deleted.~~

6. Overall Source Limit condition for a FESOP has been revised to address that PM needs to be limited for PSD avoidance.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.**
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.**
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.**

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

**Technical Support Document (TSD) for a Federally Enforceable Operating
Permit (FESOP) and New Source Review (NSR)**

Source Background and Description

Source Name:	D&L Industrial Finishes, Inc.
Source Location:	215 Brownsville Avenue, Liberty, Indiana 47353
County:	Union
SIC Code:	2851
Permit Reviewer:	Surya Ramaswamy/EVP
Permit Number:	161-22514-00001

The Office of Air Quality (OAQ) has reviewed a FESOP application from D&L Industrial Finishes, Inc. relating to the operation of a paint manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of no permitted emission units and pollution control devices.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission units:

- (a) The Grinding process consist of following units, constructed in 1989:

Emission Unit ID	Mill Description	Max. Capacity (gallons)	Stack ID
RM-01	Roller Mill	10	V-6
9P-01	Sand Mill	9	V-6
9P-02	Sand Mill	9	V-6
9P-03	Sand Mill	9	V-6
3P-01	Sand Mill	3	V-6
3P-02	Sand Mill	3	V-6
3P-03	Sand Mill	3	V-6
33I-01	Sand Mill	8.72	V-6
33I-02	Sand Mill	8.72	V-6
33I-03	Sand Mill	8.72	V-6
BM-01	Ball Mill	369	V-2
BM-02	Ball Mill	216	V-3
BM-03	Ball Mill	309	V-3
BM-04	Ball Mill	309	V-3

(b) The batch maker process consist of following units, constructed in 1989:

Emission Unit ID	Mixer Description	Max. Capacity (gallons)	Stack ID
AM-01	Air Mixer	590	V-12
AM-02	Air Mixer	550	V-12
AM-03	Air Mixer	440	V-12
AM-04	Air Mixer	330	V-12
AM-05	Air Mixer	300	V-12
AM-06	Air Mixer	275	V-12
AM-07	Air Mixer	275	V-12
AM-08	Air Mixer	250	V-12
AM-09	Air Mixer	250	V-6
AM-10	Air Mixer	220	Ventilation
SM-01	Shar Mixer	220	V-6
SM-02	Shar Mixer	220	V-5
SM-03	Shar Mixer	220	V-5
SM-04	Shar Mixer	220	V-5
SM-05	Shar Mixer	220	V-5
SM-06	Shar Mixer	220	V-6
SM-07	Shar Mixer	180	V-6
SM-08	Shar Mixer	170	V-6
SM-09	Shar Mixer	165	V-6
SM-10	Shar Mixer	4500	V-5

Emission Unit ID	Tank Description	Max. Capacity (gallons)	Stack ID
ST-01	Stationary Mixer Tank	4500	Ventilation
ST-02	Stationary Mixer Tank	4500	Ventilation
ST-03	Stationary Mixer Tank	2250	V-10
ST-04	Stationary Mixer Tank	2250	V-10
ST-05	Stationary Mixer Tank	1500	V-10
ST-06	Stationary Mixer Tank	1500	V-10
ST-07	Stationary Mixer Tank	2800	V-10
ST-08	Stationary Mixer Tank	1500	V-10
ST-09	Stationary Mixer Tank	2800	V-10
ST-10	Stationary Mixer Tank	2800	V-10
ST-11	Stationary Mixer Tank	700	V-9
ST-12	Stationary Mixer Tank	700	V-9
ST-13	Stationary Mixer Tank	700	V-9
ST-14	Stationary Mixer Tank	700	V-9
ST-15	Stationary Mixer Tank	866	V-9
ST-16	Stationary Mixer Tank	866	V-9
ST-17	Stationary Mixer Tank	1500	V-9
ST-18	Stationary Mixer Tank	2800	V-9
ST-19	Stationary Mixer Tank	750	V-9
ST-20	Stationary Mixer Tank	750	V-9

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired furnace that is used to heat the building with heat input equal to or less than ten (10) million BTU per hour.

Existing Approvals

There have been no previous approvals issued to the source.

Enforcement Issue

- (a) IDEM is aware that equipment has been operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal 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 administratively complete FESOP application for the purposes of this review was received on January 13, 2006. Additional information was received on January 30, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 4).

Potential to Emit

Pursuant to 326 IAC 2-7-1(29), 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."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential to Emit (tons/yr)
PM	236.15
PM-10	236.40
SO ₂	0.03
VOC	6494.34
CO	3.68
NO _x	4.38

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential to Emit (tons/yr)
Hexane	249.44
Non-Exempt Glycol Ether	174.04
Isophorone	103.91
Napthalene	40.26
Total	> 250

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM₁₀ are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and 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.

Potential to Emit After Issuance

The source has opted to be a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Paint Mixing and Blending Operations	< 99	< 99	0.0	24.65	0.0	0.0	Single < 10 Total < 25
Insignificant Activities	0.08	0.33	0.03	0.0	3.68	4.38	negligible
Total Emissions	< 100	< 100	0.03	24.65	3.68	4.38	Total < 25

Notes:

- 1) Pursuant to 326 IAC 2-8, source wide PM/PM₁₀ emissions including insignificant activities are limited to less than 100 tons per year by limiting pigment usage to less than 179,213.5 pounds per year.
- 2) VOC emissions are limited to less than 25 tons per year, by limiting solvent usage to less than 1,450,000 pounds per year, to render the requirements of 326 IAC 8-1-6 not applicable. This solvent usage limit shall also satisfy the requirements of 326 IAC 2-8 and render the requirements of 326 IAC 2-2 not applicable.
- 3) Single HAP and total HAPs emissions are limited to less than 10 tons per year and 25 tons per year by limiting solvent usage to less than 1,450,000 pounds per year.
- 4) PM₁₀ is assumed to be the same as PM.

County Attainment Status

The source is located in Union County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Union County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Union County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Union 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, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	Less than 100
PM-10	Less than 100
SO ₂	Less than 100
VOC	Less than 25
CO	Less than 100
NO _x	Less than 100
Single HAP	Less than 10
Combination HAPs	Less than 25

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions are based on FESOP application submitted by 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 review.
- (b) The twenty (20) mixing tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b), Subpart Kb, because each tank has a capacity less than 75 cubic meters and the mixing tanks are not storage tanks.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Coating Manufacturing (40 CFR 63, Subpart HHHHH), because this source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. See the State Rule Applicability – Entire Source 326 IAC 2-8 Section below.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Organic Chemical Manufacturing and Miscellaneous Coating Manufacturing (40 CFR 63, Subpart FFFF), because this source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. See the State Rule Applicability – Entire Source 326 IAC 2-8 Section below.
- (e) The requirements of the National Emission Standards for Equipment Leaks, 40 CFR 61.240, Subpart V, are not included in this permit, because no other subpart of 40 CFR Part 61 is not included in this permit.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 326 IAC 20; 40 CFR Part 61 and 40 CFR Part 63) included in this permit.

State Rule Applicability – Entire Source

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

Although the source has an SIC code of 2851, this operation is not considered chemical processing. There is no chemical synthesis or chemical reactions occurring in the processes. The source is mixing pigments and solvents to manufacture paints. Therefore, the source, located in Union County, is not one of the twenty-eight (28) listed source categories. The source was constructed in 1989, the potential to emit of all criteria pollutants are limited to less than two hundred fifty (250) tons per year, and no major modifications have occurred. The source wide PM₁₀ and VOC emissions are limited by 326 IAC 2-8-4 to less than 100 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2, are not applicable.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply:

- (a) The total solvent usage in paint manufacturing facilities shall be limited to 1,450,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to VOC emissions of 24.65 tons per twelve (12) consecutive month period, based on the emission factor of 0.034 lb/lb of solvent used.

Note: The emission factor of 0.034 lb/lb of solvent used for determining the VOC emissions is from the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities.

- (b) The maximum single HAP emissions shall not exceed 0.0137 lb HAP/lb of solvent used. This HAP limit, in conjunction with the solvent usage limit in (a), is equivalent to limiting single HAP and total HAP emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, based on the above mentioned emission factor.
- (c) The total pigment usage in paint manufacturing facility shall be limited to 179,213.5 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to 0.9 tons of PM/PM₁₀ per twelve (12) consecutive month period, based on the emission factor of 20 lb/ton of pigment used.

Note: The emission factor of 20 lb/lb of pigment used for determining the PM/PM₁₀ emissions is from the U.S. EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities.

Compliance with above usage limitations shall limit the source-wide VOC and PM/PM₁₀, emissions to less than 25 and 100 tons per twelve (12) consecutive month period, respectively; and single HAP, and total HAPs emission to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) and 40 CFR 63 (NESHAP) does not apply. This emission limitation will also render 326 IAC 2-2 not applicable.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

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

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). All current operations at this plant were constructed before the rule applicability date of July 27, 1997. Therefore, these facilities are not subject to the requirements of 326 IAC 2-4.1-1.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions, because the fugitive particulate matter emissions from this source are less than 25 tons per year.

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to 326 IAC 6-3-1(b)(14), this rule does not apply to the following emission units because these units have potential particulate emission of less than five hundred fifty-one thousandths (0.551) pounds per hour.

Emission Unit	Potential PM Emissions, lbs/hr
Roller Mill	0.003
Sand mill 9P-01	0.003
Sand mill 9P-02	0.003
Sand mill 9P-03	0.003
Sand mill 3P-01	0.001
Sand mill 3P-02	0.001
Sand mill 3P-03	0.001
Sand mill 33I-01	0.003
Sand mill 33I-02	0.003
Sand mill 33I-03	0.003
Ball mill BM-01	0.141
Ball mill BM-02	0.082
Ball mill BM-03	0.118
Ball mill BM-04	0.118
Air Mixer-03	0.504
Air Mixer-04	0.378
Air Mixer-05	0.344
Air Mixer-06	0.315

Air Mixer-07	0.315
Air Mixer-08	0.286
Air Mixer-09	0.286
Air Mixer-10	0.252
Shar Mixer -01	0.252
Shar Mixer -02	0.252
Shar Mixer -03	0.252
Shar Mixer -04	0.252
Shar Mixer -05	0.252
Shar Mixer -06	0.252
Shar Mixer -07	0.206
Shar Mixer -08	0.195
Shar Mixer -09	0.189

- (b) 326 IAC 6-3-2(e) applies to the following emission units. Pursuant to this rule, the particulate emissions for these units shall be limited by the following equation:

Interpolation and extrapolation 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:

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

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

Calculations of emissions limitations are on page 2 of 4 of TSD Appendix A. Emissions are limited as follows:

Emission Unit	Maximum Pigments Usage, lbs/yr	Maximum Pigments Usage, lbs/hr	Allowable PM Emission Rate in lbs/hr	Potential PM Emission Rate in lb/hr
Air Mixer-01	593,041.60	1,624.77	3.57	0.68
Air Mixer-02	552,835.39	1,514.62	3.40	0.63
Shar Mixer -10	4,523,198.63	12,392.33	13.92	5.16
Stationary Mix Tank -01	4,523,198.63	12,392.33	13.92	5.16
Stationary Mix Tank -02	4,523,198.63	12,392.33	13.92	5.16
Stationary Mix Tank -03	2,261,599.31	6,196.16	8.75	2.58
Stationary Mix Tank -04	2,261,599.31	6,196.16	8.75	2.58
Stationary Mix Tank -05	1,507,732.88	4,130.78	6.67	1.72
Stationary Mix Tank -06	1,507,732.88	4,130.78	6.67	1.72
Stationary Mix Tank -07	2,814,434.70	7,710.78	10.13	3.21
Stationary Mix Tank -08	1,507,732.88	4,130.78	6.67	1.72
Stationary Mix Tank -09	2,814,434.70	7,710.78	10.13	3.21
Stationary Mix Tank -10	2,814,434.70	7,710.78	10.13	3.21
Stationary Mix Tank -11	703,608.68	1,927.70	4.00	0.80
Stationary Mix Tank -12	703,608.68	1,927.70	4.00	0.80
Stationary Mix Tank -13	703,608.68	1,927.70	4.00	0.80
Stationary Mix Tank -14	703,608.68	1,927.70	4.00	0.80
Stationary Mix Tank -15	870,464.45	2,384.83	4.61	0.99
Stationary Mix Tank -16	870,464.45	2,384.83	4.61	0.99

Stationary Mix Tank -17	1,507,732.88	4,130.78	6.67	1.72
Stationary Mix Tank -18	2,814,434.70	7,710.78	10.13	3.21
Stationary Mix Tank -19	753,866.44	2,065.39	4.19	0.86
Stationary Mix Tank -20	753,866.44	2,065.39	4.19	0.86

According to the tables, the operation of all the above listed mills (for grinding), mixers and mix tanks will be in compliance with the requirements of 326 IAC 6-3-2.

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

Pursuant to 326 IAC 8-1-6, new facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons or more per year, and which are not otherwise regulated by another provision of Article 8, are subject to the requirements of this rule. Potential VOC emissions from the paint manufacturing operations are greater than 25 tons per year and were constructed in 1989. Therefore the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6 are potentially applicable to these facilities.

Emission Unit	VOC, tons/year
Air Mixer-01	81.57
Air Mixer-02	76.04
Air Mixer-03	60.83
Air Mixer-04	45.62
Air Mixer-05	41.48
Air Mixer-06	38.02
Air Mixer-07	38.02
Air Mixer-08	34.56
Air Mixer-09	34.56
Air Mixer-10	30.42
Shar Mixer -01	30.42
Shar Mixer -02	30.42
Shar Mixer -03	30.42
Shar Mixer -04	30.42
Shar Mixer -05	30.42
Shar Mixer -06	30.42
Shar Mixer -10	622.15
Stationary Mix Tank -01	622.15
Stationary Mix Tank -02	622.15
Stationary Mix Tank -03	311.07
Stationary Mix Tank -04	311.07
Stationary Mix Tank -05	207.38
Stationary Mix Tank -06	207.38
Stationary Mix Tank -07	387.11
Stationary Mix Tank -08	207.38
Stationary Mix Tank -09	387.11
Stationary Mix Tank -10	387.11
Stationary Mix Tank -11	96.78
Stationary Mix Tank -12	96.78
Stationary Mix Tank -13	96.78

Stationary Mix Tank -14	96.78
Stationary Mix Tank -15	119.73
Stationary Mix Tank -16	119.73
Stationary Mix Tank -17	207.38
Stationary Mix Tank -18	387.11
Stationary Mix Tank -19	103.69
Stationary Mix Tank -20	103.69

D&L Industrial Finishes, Inc. has opted to limit the source wide potential to emit VOC to less than twenty-five (25) tons per year by limiting source wide solvent usage to 1,450,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to limiting source wide VOC emissions of 24.65 tons per twelve (12) consecutive months, based on the emission factor of 0.034 lb/lb of solvent. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these facilities.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this permit at this time.

Conclusion

The operation of this paint manufacturing facility shall be subject to the conditions of the **FESOP 161-22514-00001**.

Appendix A: Emissions Calculations
VOC and Particulate
From Paint Manufacturing Operations
Company Name: D & L Industrial Finishes, Inc.
Address City IN Zip: 215 Brownsville Avenue, Liberty, IN 47353
Permit Number: FESOP 161-22514-00001
Pt ID: 161-00001
Reviewer: KSR / EVP
Date: Mar-06

Potential To Emit:

Emission Unit	Maximum Batches/Day	Maximum Gallons/Batch	Maximum Gallons/Year	Density, gal/lbs ⁽¹⁾	Maximum Pigments, lbs/yr ⁽²⁾	Maximum Solvent, lbs/yr ⁽²⁾	Emission Factor, lbs of PM/tons of pigment used ⁽³⁾	Emission Factor, lbs of VOC/lbs of Solvent used ⁽³⁾	PM, lbs/hr	PM, tons/year	VOC, tons/year
Roller Mill	1	10.00	3,650.00	8.345	3,350.52	27,108.73	20.00	0.034	0.004	0.02	0.46
Sand mill 9P-01	1	9.00	3,285.00	8.345	3,015.47	24,397.86	20.00	0.034	0.003	0.02	0.41
Sand mill 9P-02	1	9.00	3,285.00	8.345	3,015.47	24,397.86	20.00	0.034	0.003	0.02	0.41
Sand mill 9P-03	1	9.00	3,285.00	8.345	3,015.47	24,397.86	20.00	0.034	0.003	0.02	0.41
Sand mill 3P-01	1	3.00	1,095.00	8.345	1,005.16	8,132.62	20.00	0.034	0.001	0.01	0.14
Sand mill 3P-02	1	3.00	1,095.00	8.345	1,005.16	8,132.62	20.00	0.034	0.001	0.01	0.14
Sand mill 3P-03	1	3.00	1,095.00	8.345	1,005.16	8,132.62	20.00	0.034	0.001	0.01	0.14
Sand mill 33I-01	1	8.72	3,182.80	8.345	2,921.65	23,638.81	20.00	0.034	0.003	0.01	0.40
Sand mill 33I-02	1	8.72	3,182.80	8.345	2,921.65	23,638.81	20.00	0.034	0.003	0.01	0.40
Sand mill 33I-03	1	8.72	3,182.80	8.345	2,921.65	23,638.81	20.00	0.034	0.003	0.01	0.40
Ball mill BM-01	1	369.00	134,685.00	8.345	123,634.10	1,000,312.23	20.00	0.034	0.141	0.62	17.01
Ball mill BM-02	1	216.00	78,840.00	8.345	72,371.18	585,548.62	20.00	0.034	0.083	0.36	9.95
Ball mill BM-03	1	309.00	112,785.00	8.345	103,530.99	837,659.83	20.00	0.034	0.118	0.52	14.24
Ball mill BM-04	1	309.00	112,785.00	8.345	103,530.99	837,659.83	20.00	0.034	0.118	0.52	14.24
Air Mixer-01	3	590.00	646,050.00	8.345	593,041.60	4,798,245.65	20.00	0.034	0.677	2.97	81.57
Air Mixer-02	3	550.00	602,250.00	8.345	552,835.39	4,472,940.86	20.00	0.034	0.631	2.76	76.04
Air Mixer-03	3	440.00	481,800.00	8.345	442,268.31	3,578,352.89	20.00	0.034	0.505	2.21	60.83
Air Mixer-04	3	330.00	361,350.00	8.345	331,701.23	2,683,764.52	20.00	0.034	0.379	1.66	45.62
Air Mixer-05	3	300.00	328,500.00	8.345	301,546.58	2,439,785.93	20.00	0.034	0.344	1.51	41.48
Air Mixer-06	3	275.00	301,125.00	8.345	276,417.69	2,236,470.43	20.00	0.034	0.316	1.38	38.02
Air Mixer-07	3	275.00	301,125.00	8.345	276,417.69	2,236,470.43	20.00	0.034	0.316	1.38	38.02
Air Mixer-08	3	250.00	273,750.00	8.345	251,288.81	2,033,154.94	20.00	0.034	0.287	1.26	34.56
Air Mixer-09	3	250.00	273,750.00	8.345	251,288.81	2,033,154.94	20.00	0.034	0.287	1.26	34.56
Air Mixer-10	3	220.00	240,900.00	8.345	221,134.16	1,789,176.35	20.00	0.034	0.252	1.11	30.42
Shar Mixer -01	3	220.00	240,900.00	8.345	221,134.16	1,789,176.35	20.00	0.034	0.252	1.11	30.42
Shar Mixer -02	3	220.00	240,900.00	8.345	221,134.16	1,789,176.35	20.00	0.034	0.252	1.11	30.42
Shar Mixer -03	3	220.00	240,900.00	8.345	221,134.16	1,789,176.35	20.00	0.034	0.252	1.11	30.42
Shar Mixer -04	3	220.00	240,900.00	8.345	221,134.16	1,789,176.35	20.00	0.034	0.252	1.11	30.42
Shar Mixer -05	3	220.00	240,900.00	8.345	221,134.16	1,789,176.35	20.00	0.034	0.252	1.11	30.42
Shar Mixer -06	3	220.00	240,900.00	8.345	221,134.16	1,789,176.35	20.00	0.034	0.252	1.11	30.42
Shar Mixer -07	3	180.00	197,100.00	8.345	180,927.95	1,463,871.56	20.00	0.034	0.207	0.90	24.89
Shar Mixer -08	3	170.00	186,150.00	8.345	170,876.39	1,382,545.36	20.00	0.034	0.195	0.85	23.50
Shar Mixer -09	3	165.00	180,675.00	8.345	165,850.62	1,341,882.26	20.00	0.034	0.189	0.83	22.81
Shar Mixer -10	3	4,500.00	4,927,500.00	8.345	4,523,198.63	36,596,788.88	20.00	0.034	5.163	22.62	622.15
Stationary Mix Tank -01	3	4,500.00	4,927,500.00	8.345	4,523,198.63	36,596,788.88	20.00	0.034	5.163	22.62	622.15
Stationary Mix Tank -02	3	4,500.00	4,927,500.00	8.345	4,523,198.63	36,596,788.88	20.00	0.034	5.163	22.62	622.15
Stationary Mix Tank -03	3	2,250.00	2,463,750.00	8.345	2,261,599.31	18,298,394.44	20.00	0.034	2.582	11.31	311.07
Stationary Mix Tank -04	3	2,250.00	2,463,750.00	8.345	2,261,599.31	18,298,394.44	20.00	0.034	2.582	11.31	311.07
Stationary Mix Tank -05	3	1,500.00	1,642,500.00	8.345	1,507,732.88	12,198,929.63	20.00	0.034	1.721	7.54	207.38
Stationary Mix Tank -06	3	1,500.00	1,642,500.00	8.345	1,507,732.88	12,198,929.63	20.00	0.034	1.721	7.54	207.38
Stationary Mix Tank -07	3	2,800.00	3,066,000.00	8.345	2,814,434.70	22,771,335.30	20.00	0.034	3.213	14.07	387.11
Stationary Mix Tank -08	3	1,500.00	1,642,500.00	8.345	1,507,732.88	12,198,929.63	20.00	0.034	1.721	7.54	207.38
Stationary Mix Tank -09	3	2,800.00	3,066,000.00	8.345	2,814,434.70	22,771,335.30	20.00	0.034	3.213	14.07	387.11
Stationary Mix Tank -10	3	2,800.00	3,066,000.00	8.345	2,814,434.70	22,771,335.30	20.00	0.034	3.213	14.07	387.11
Stationary Mix Tank -11	3	700.00	766,500.00	8.345	703,608.68	5,692,833.83	20.00	0.034	0.803	3.52	96.78
Stationary Mix Tank -12	3	700.00	766,500.00	8.345	703,608.68	5,692,833.83	20.00	0.034	0.803	3.52	96.78
Stationary Mix Tank -13	3	700.00	766,500.00	8.345	703,608.68	5,692,833.83	20.00	0.034	0.803	3.52	96.78
Stationary Mix Tank -14	3	700.00	766,500.00	8.345	703,608.68	5,692,833.83	20.00	0.034	0.803	3.52	96.78
Stationary Mix Tank -15	3	866.00	948,270.00	8.345	870,464.45	7,042,848.70	20.00	0.034	0.994	4.35	119.73
Stationary Mix Tank -16	3	866.00	948,270.00	8.345	870,464.45	7,042,848.70	20.00	0.034	0.994	4.35	119.73
Stationary Mix Tank -17	3	1,500.00	1,642,500.00	8.345	1,507,732.88	12,198,929.63	20.00	0.034	1.721	7.54	207.38
Stationary Mix Tank -18	3	2,800.00	3,066,000.00	8.345	2,814,434.70	22,771,335.30	20.00	0.034	3.213	14.07	387.11
Stationary Mix Tank -19	3	750.00	821,250.00	8.345	753,866.44	6,099,464.81	20.00	0.034	0.861	3.77	103.69
Stationary Mix Tank -20	3	750.00	821,250.00	8.345	753,866.44	6,099,464.81	20.00	0.034	0.861	3.77	103.69
Total in TPY										236.07	6494.10

Allowable Emission

Maximum Pigments, lbs/yr	Maximum Solvent, lbs/yr	Emission Factor, lbs of PM/tons of pigment used	Emission Factor, lbs of VOC/lbs of Solvent used	PM, tons/yr	VOC, tons/yr
179,213.48	1,450,000.00	20.00	0.034	0.90	24.65

Note:

- (1) The density used for the paint product is the density of water. This assumption was made due to the varied paints produced at the facility which are both solvent based and water based. The density is a conservative estimate for the potential emissions. This density is used only to determine the potential to emit.
- (2) Based on the source information the coatings contain approximately 11% pigment and the rest is solvent (89%).
- (3) Emission Factors are obtained from U.S EPA Inventory Improvement Program (EIIP) Volume II: Chapter 8 Methods for Estimating Air emission from Paint, Ink, and other Coating Manufacturing Facilities.
- (4) PM10 emissions were set equal to the PM

Methodology:

maximum gallons/year = maximum batch/day x maximum gallons/batch x 365 days
maximum pigments, lbs/yr = maximum gallons/year x 0.11 x density(gallons/lbs)
maximum solvent, lbs/yr = maximum gallons/year x 0.89 x density(gallons/lbs)
potential emission of PM in TPY = (maximum pigments, (tons/yr) x emission factor, (lbs of PM/tons of pigment used))/2000
potential emission of VOC in TPY = (maximum solvent used, (lbs/yr) x emission factor, (lbs of VOC/lbs of solvent used))/2000

Appendix A: Emissions Calculations
Particulate Emission Limitations
From Paint Manufacturing Operations
Company Name: D & L Industrial Finishes, Inc.
Address City IN Zip: 215 Brownsville Avenue, Liberty, IN 47353
Permit Number: FESOP 161-22514-00001
Plt ID: 161-00001
Reviewer: KSR / EVP
Date: Jan-06

Emission Unit	Maximum Pigments Usage, lbs/yr	Maximum Pigments Usage, lbs/hr	Allowable PM Emission Rate in lbs/hr⁽¹⁾	Potential PM Emission Rate in lb/hr
Air Mixer-01	593,041.60	1,624.77	3.57	0.68
Air Mixer-02	552,835.39	1,514.62	3.40	0.63
Shar Mixer -10	4,523,198.63	12,392.33	13.92	5.16
Stationary Mix Tank -01	4,523,198.63	12,392.33	13.92	5.16
Stationary Mix Tank -02	4,523,198.63	12,392.33	13.92	5.16
Stationary Mix Tank -03	2,261,599.31	6,196.16	8.75	2.58
Stationary Mix Tank -04	2,261,599.31	6,196.16	8.75	2.58
Stationary Mix Tank -05	1,507,732.88	4,130.78	6.67	1.72
Stationary Mix Tank -06	1,507,732.88	4,130.78	6.67	1.72
Stationary Mix Tank -07	2,814,434.70	7,710.78	10.13	3.21
Stationary Mix Tank -08	1,507,732.88	4,130.78	6.67	1.72
Stationary Mix Tank -09	2,814,434.70	7,710.78	10.13	3.21
Stationary Mix Tank -10	2,814,434.70	7,710.78	10.13	3.21
Stationary Mix Tank -11	703,608.68	1,927.70	4.00	0.80
Stationary Mix Tank -12	703,608.68	1,927.70	4.00	0.80
Stationary Mix Tank -13	703,608.68	1,927.70	4.00	0.80
Stationary Mix Tank -14	703,608.68	1,927.70	4.00	0.80
Stationary Mix Tank -15	870,464.45	2,384.83	4.61	0.99
Stationary Mix Tank -16	870,464.45	2,384.83	4.61	0.99
Stationary Mix Tank -17	1,507,732.88	4,130.78	6.67	1.72
Stationary Mix Tank -18	2,814,434.70	7,710.78	10.13	3.21
Stationary Mix Tank -19	753,866.44	2,065.39	4.19	0.86
Stationary Mix Tank -20	753,866.44	2,065.39	4.19	0.86

(1) The PTE is limited by the Process Weight Rate Regulation 326 IAC 6-3.

(2) The PTE in terms of tons per year is based on continuous hours of operation.

Appendix A: Emissions Calculations
HAPs Emission
From Paint Manufacturing Operations
Company Name: D & L Industrial Finishes, Inc.
Address City IN Zip: 215 Brownsville Avenue, Liberty, IN 47353
Permit Number: FESOP 161-22514-00001
PI ID: 161-00001
Reviewer: KSR / EVP
Date: Jan-06

Potential To Emit:

Emission Unit	Maximum Batches/Day	Maximum Gallons/Batch	Maximum Gallons/Yr	Density, gal/lbs ⁽¹⁾	Maximum Solvent, lbs/yr ⁽²⁾	Emission Factor, lbs of VOC/lbs of Solvent used ⁽³⁾	VOC, tons/year	Toluene ⁽⁴⁾		Non-Exempt Glycol Ether ⁽⁴⁾		Dimethyl Phthalate ⁽⁴⁾		Naphthalene ⁽⁴⁾		Isophorone ⁽⁴⁾		Hexane ⁽⁴⁾	
								%	tons/yr	%	tons/yr	%	tons/yr	%	tons/yr	%	tons/yr	%	tons/yr
Roller Mill	1	10.00	3,650.00	8.345	27,108.73	0.034	0.46	0.03%	0.00	2.68%	0.01	0.01%	0.00	0.62%	0.00	1.60%	0.01	3.84%	0.02
Sand mill 9P-01	1	9.00	3,285.00	8.345	24,397.86	0.034	0.41	0.03%	0.00	2.68%	0.01	0.01%	0.00	0.62%	0.00	1.60%	0.01	3.84%	0.02
Sand mill 9P-02	1	9.00	3,285.00	8.345	24,397.86	0.034	0.41	0.03%	0.00	2.68%	0.01	0.01%	0.00	0.62%	0.00	1.60%	0.01	3.84%	0.02
Sand mill 9P-03	1	9.00	3,285.00	8.345	24,397.86	0.034	0.41	0.03%	0.00	2.68%	0.01	0.01%	0.00	0.62%	0.00	1.60%	0.01	3.84%	0.02
Sand mill 3P-01	1	3.00	1,095.00	8.345	8,132.62	0.034	0.14	0.03%	0.00	2.68%	0.00	0.01%	0.00	0.62%	0.00	1.60%	0.00	3.84%	0.01
Sand mill 3P-02	1	3.00	1,095.00	8.345	8,132.62	0.034	0.14	0.03%	0.00	2.68%	0.00	0.01%	0.00	0.62%	0.00	1.60%	0.00	3.84%	0.01
Sand mill 3P-03	1	3.00	1,095.00	8.345	8,132.62	0.034	0.14	0.03%	0.00	2.68%	0.00	0.01%	0.00	0.62%	0.00	1.60%	0.00	3.84%	0.01
Sand mill 33I-01	1	8.72	3,182.80	8.345	23,638.81	0.034	0.40	0.03%	0.00	2.68%	0.01	0.01%	0.00	0.62%	0.00	1.60%	0.01	3.84%	0.02
Sand mill 33I-02	1	8.72	3,182.80	8.345	23,638.81	0.034	0.40	0.03%	0.00	2.68%	0.01	0.01%	0.00	0.62%	0.00	1.60%	0.01	3.84%	0.02
Sand mill 33I-03	1	8.72	3,182.80	8.345	23,638.81	0.034	0.40	0.03%	0.00	2.68%	0.01	0.01%	0.00	0.62%	0.00	1.60%	0.01	3.84%	0.02
Ball mill BM-01	1	369.00	134,685.00	8.345	1,000,312.23	0.034	17.01	0.03%	0.01	2.68%	0.46	0.01%	0.00	0.62%	0.11	1.60%	0.27	3.84%	0.65
Ball mill BM-02	1	216.00	78,840.00	8.345	585,548.62	0.034	9.95	0.03%	0.00	2.68%	0.27	0.01%	0.00	0.62%	0.06	1.60%	0.16	3.84%	0.38
Ball mill BM-03	1	309.00	112,785.00	8.345	837,659.83	0.034	14.24	0.03%	0.00	2.68%	0.38	0.01%	0.00	0.62%	0.09	1.60%	0.23	3.84%	0.55
Ball mill BM-04	1	309.00	112,785.00	8.345	837,659.83	0.034	14.24	0.03%	0.00	2.68%	0.38	0.01%	0.00	0.62%	0.09	1.60%	0.23	3.84%	0.55
Air Mixer-01	3	590.00	646,050.00	8.345	4,798,245.65	0.034	81.57	0.03%	0.03	2.68%	2.19	0.01%	0.01	0.62%	0.51	1.60%	1.31	3.84%	3.13
Air Mixer-02	3	550.00	602,250.00	8.345	4,472,940.86	0.034	76.04	0.03%	0.03	2.68%	2.04	0.01%	0.01	0.62%	0.47	1.60%	1.22	3.84%	2.92
Air Mixer-03	3	440.00	481,800.00	8.345	3,578,352.69	0.034	60.83	0.03%	0.02	2.68%	1.63	0.01%	0.01	0.62%	0.38	1.60%	0.97	3.84%	2.34
Air Mixer-04	3	330.00	361,350.00	8.345	2,683,764.52	0.034	45.62	0.03%	0.02	2.68%	1.22	0.01%	0.00	0.62%	0.28	1.60%	0.73	3.84%	1.75
Air Mixer-05	3	300.00	328,500.00	8.345	2,439,785.93	0.034	41.48	0.03%	0.01	2.68%	1.11	0.01%	0.00	0.62%	0.26	1.60%	0.66	3.84%	1.59
Air Mixer-06	3	275.00	301,125.00	8.345	2,236,470.43	0.034	38.02	0.03%	0.01	2.68%	1.02	0.01%	0.00	0.62%	0.24	1.60%	0.61	3.84%	1.46
Air Mixer-07	3	275.00	301,125.00	8.345	2,236,470.43	0.034	38.02	0.03%	0.01	2.68%	1.02	0.01%	0.00	0.62%	0.24	1.60%	0.61	3.84%	1.46
Air Mixer-08	3	250.00	273,750.00	8.345	2,033,154.94	0.034	34.56	0.03%	0.01	2.68%	0.93	0.01%	0.00	0.62%	0.21	1.60%	0.55	3.84%	1.33
Air Mixer-09	3	250.00	273,750.00	8.345	2,033,154.94	0.034	34.56	0.03%	0.01	2.68%	0.93	0.01%	0.00	0.62%	0.21	1.60%	0.55	3.84%	1.33
Air Mixer-10	3	220.00	240,900.00	8.345	1,789,176.35	0.034	30.42	0.03%	0.01	2.68%	0.82	0.01%	0.00	0.62%	0.19	1.60%	0.49	3.84%	1.17
Shar Mixer-01	3	220.00	240,900.00	8.345	1,789,176.35	0.034	30.42	0.03%	0.01	2.68%	0.82	0.01%	0.00	0.62%	0.19	1.60%	0.49	3.84%	1.17
Shar Mixer-02	3	220.00	240,900.00	8.345	1,789,176.35	0.034	30.42	0.03%	0.01	2.68%	0.82	0.01%	0.00	0.62%	0.19	1.60%	0.49	3.84%	1.17
Shar Mixer-03	3	220.00	240,900.00	8.345	1,789,176.35	0.034	30.42	0.03%	0.01	2.68%	0.82	0.01%	0.00	0.62%	0.19	1.60%	0.49	3.84%	1.17
Shar Mixer-04	3	220.00	240,900.00	8.345	1,789,176.35	0.034	30.42	0.03%	0.01	2.68%	0.82	0.01%	0.00	0.62%	0.19	1.60%	0.49	3.84%	1.17
Shar Mixer-05	3	220.00	240,900.00	8.345	1,789,176.35	0.034	30.42	0.03%	0.01	2.68%	0.82	0.01%	0.00	0.62%	0.19	1.60%	0.49	3.84%	1.17
Shar Mixer-06	3	220.00	240,900.00	8.345	1,789,176.35	0.034	30.42	0.03%	0.01	2.68%	0.82	0.01%	0.00	0.62%	0.19	1.60%	0.49	3.84%	1.17
Shar Mixer-07	3	180.00	197,100.00	8.345	1,463,871.56	0.034	24.89	0.03%	0.01	2.68%	0.67	0.01%	0.00	0.62%	0.15	1.60%	0.40	3.84%	0.96
Shar Mixer-08	3	170.00	186,150.00	8.345	1,382,545.36	0.034	23.50	0.03%	0.01	2.68%	0.63	0.01%	0.00	0.62%	0.15	1.60%	0.38	3.84%	0.90
Shar Mixer-09	3	165.00	180,675.00	8.345	1,341,882.26	0.034	22.81	0.03%	0.01	2.68%	0.61	0.01%	0.00	0.62%	0.14	1.60%	0.36	3.84%	0.88
Shar Mixer-10	3	4,500.00	4,927,500.00	8.345	36,596,788.88	0.034	622.15	0.03%	0.20	2.68%	16.67	0.01%	0.06	0.62%	3.86	1.60%	9.95	3.84%	23.89
Stationary Mix Tank -01	3	4,500.00	4,927,500.00	8.345	36,596,788.88	0.034	622.15	0.03%	0.20	2.68%	16.67	0.01%	0.06	0.62%	3.86	1.60%	9.95	3.84%	23.89
Stationary Mix Tank -02	3	4,500.00	4,927,500.00	8.345	36,596,788.88	0.034	622.15	0.03%	0.20	2.68%	16.67	0.01%	0.06	0.62%	3.86	1.60%	9.95	3.84%	23.89
Stationary Mix Tank -03	3	2,250.00	2,463,750.00	8.345	18,298,394.44	0.034	311.07	0.03%	0.10	2.68%	8.34	0.01%	0.03	0.62%	1.93	1.60%	4.98	3.84%	11.95
Stationary Mix Tank -04	3	2,250.00	2,463,750.00	8.345	18,298,394.44	0.034	311.07	0.03%	0.10	2.68%	8.34	0.01%	0.03	0.62%	1.93	1.60%	4.98	3.84%	11.95
Stationary Mix Tank -05	3	1,500.00	1,642,500.00	8.345	12,198,929.63	0.034	207.38	0.03%	0.07	2.68%	5.56	0.01%	0.02	0.62%	1.29	1.60%	3.32	3.84%	7.96
Stationary Mix Tank -06	3	1,500.00	1,642,500.00	8.345	12,198,929.63	0.034	207.38	0.03%	0.07	2.68%	5.56	0.01%	0.02	0.62%	1.29	1.60%	3.32	3.84%	7.96
Stationary Mix Tank -07	3	2,800.00	3,066,000.00	8.345	22,771,335.30	0.034	387.11	0.03%	0.13	2.68%	10.37	0.01%	0.04	0.62%	2.40	1.60%	6.19	3.84%	14.87
Stationary Mix Tank -08	3	1,500.00	1,642,500.00	8.345	12,198,929.63	0.034	207.38	0.03%	0.07	2.68%	5.56	0.01%	0.02	0.62%	1.29	1.60%	3.32	3.84%	7.96
Stationary Mix Tank -09	3	2,800.00	3,066,000.00	8.345	22,771,335.30	0.034	387.11	0.03%	0.13	2.68%	10.37	0.01%	0.04	0.62%	2.40	1.60%	6.19	3.84%	14.87
Stationary Mix Tank -10	3	2,800.00	3,066,000.00	8.345	22,771,335.30	0.034	387.11	0.03%	0.13	2.68%	10.37	0.01%	0.04	0.62%	2.40	1.60%	6.19	3.84%	14.87
Stationary Mix Tank -11	3	700.00	766,500.00	8.345	5,692,833.83	0.034	96.78	0.03%	0.03	2.68%	2.59	0.01%	0.01	0.62%	0.60	1.60%	1.55	3.84%	3.72
Stationary Mix Tank -12	3	700.00	766,500.00	8.345	5,692,833.83	0.034	96.78	0.03%	0.03	2.68%	2.59	0.01%	0.01	0.62%	0.60	1.60%	1.55	3.84%	3.72
Stationary Mix Tank -13	3	700.00	766,500.00	8.345	5,692,833.83	0.034	96.78	0.03%	0.03	2.68%	2.59	0.01%	0.01	0.62%	0.60	1.60%	1.55	3.84%	3.72
Stationary Mix Tank -14	3	700.00	766,500.00	8.345	5,692,833.83	0.034	96.78	0.03%	0.03	2.68%	2.59	0.01%	0.01	0.62%	0.60	1.60%	1.55	3.84%	3.72
Stationary Mix Tank -15	3	866.00	948,270.00	8.345	7,042,848.70	0.034	119.73	0.03%	0.04	2.68%	3.21	0.01%	0.01	0.62%	0.74	1.60%	1.92	3.84%	4.60
Stationary Mix Tank -16	3	866.00	948,270.00	8.345	7,042,848.70	0.034	119.73	0.03%	0.04	2.68%	3.21	0.01%	0.01	0.62%	0.74	1.60%	1.92	3.84%	4.60
Stationary Mix Tank -17	3	1,500.00	1,642,500.00	8.345	12,198,929.63	0.034	207.38	0.03%	0.07	2.68%	5.56	0.01%	0.02	0.62%	1.29	1.60%	3.32	3.84%	7.96
Stationary Mix Tank -18	3	2,800.00	3,066,000.00	8.345	22,771,335.30	0.034	387.11	0.03%	0.13	2.68%	10.37	0.01%	0.04	0.62%	2.40	1.60%	6.19	3.84%	14.87
Stationary Mix Tank -19	3	750.00	821,250.00	8.345	6,099,464.81	0.034	103.69	0.03%	0.03	2.68%	2.78	0.01%	0.01	0.62%	0.64	1.60%	1.66	3.84%	3.98
Stationary Mix Tank -20	3	750.00	821,250.00	8.345	6,099,464.81	0.034	103.69	0.03%	0.03	2.68%	2.78	0.01%	0.01	0.62%	0.64	1.60%	1.66	3.84%	3.98
Total in TPY							6494.10	2.14	174.04	0.65	40.26	103.91	249.37						

Allowable Emission:

Maximum Solvent, lbs/yr	Emission Factor, lbs of VOC/lbs of Solvent used	VOC, tons/year	Toluene		Non-Exempt Glycol Ether		Dimethyl Phthalate		Naphthalene		Isophorone		Hexane		
			%	tons/yr	%	tons/yr	%	tons/yr	%	tons/yr	%	tons/yr	%	tons/yr	
1,450,000.00	0.034	24.65	0.03%	0.01	2.68%	0.66	0.01%	0.00	0.62%	0.15	1.60%	0.39	3.84%	0.95	
Total HAPs in TPY			= 2.16												

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Boilers

Company Name: D & L Industrial Finishes, Inc.

Address City IN Zip: 215 Brownsville Avenue, Liberty, IN 47353

Permit Number: FESOP 161-22514-00001

Plt ID: 161-00001

Reviewer: KSR / EVP

Date: Jan-06

Heat Input Capacity

MMBtu/hr

10.0

Potential Throughput

MMCF/yr

87.6

	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	0.08	0.33	0.03	4.38	0.24	3.68

*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

See next page for HAPs emissions calculations.

	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	9.198E-05	5.256E-05	3.285E-03	7.884E-02	1.489E-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	2.190E-05	4.818E-05	6.132E-05	1.664E-05	9.198E-05

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

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