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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: September 7, 2006

RE: Rhinehart Finishing, LLC / 033-22778-00078

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06

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MINOR SOURCE OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Rhinehart Finishing, LLC
5345 County Road 68
Spencerville, Indiana 46788

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages. This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

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

Operation Permit No.: MSOP 033-22778-00078	
Issued by: Origin signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:September 7, 2006 Expiration Date:September 7, 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary custom coating and finishing plant.

Authorized Individual:	General Manager
Source Address:	5345 County Road 68, Spencerville, Indiana 46788
Mailing Address:	5345 County Road 68, Spencerville, Indiana 46788
General Source Phone:	(260) 238-4442
SIC Code:	3749
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants Minor Source Operating Permit
Source Status:	Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

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

(a) Surface coating operations consisting of the following:

(1) Four (4) spray paint booths (identified as PB-1, PB-2, PB-3 and PB-4), each equipped with four (4) high volume low pressure (HVLP) spray guns used for painting steel, aluminum and plastic parts. The maximum capacity of each spray booth is 425 square feet of coating per hour, with particulate matter emissions controlled by dry filters, and exhausting at stacks S-19, S-20, S-21, and S-22. These units were constructed in 2001.

(2) Two (2) paint booths (identified as PB-5 and PB-6) equipped with two (2) high volume low pressure (HVLP) paint guns, each with a maximum throughput rate of 425 square feet of coating per hour, and exhausting at stacks S-005 and S-006. The paint booths are controlled by dry filters and were installed in 2005.

(3) Two (2) paint mix rooms (identified as PMR-1 and PMR-2), each with a maximum throughput of 23 gallons of paint per day with VOC and HAP emissions exhausted through stacks S-27 and S-33, respectively. PMR-1 and PMR-2 were constructed in 2001 and 2005, respectively.

(4) Four (4) spray paint booths (identified as PB-7, PB-8, PB-9 and PB-10), each equipped with four (4) high volume low pressure (HVLP) spray guns used for painting steel, aluminum and plastic parts. The maximum capacity of each spray booth is 425 square feet of coating per hour, with particulate matter emissions controlled by dry filters, and exhausting at stacks S-34, S-35, S-36, and S-37. These units will be constructed in 2006.

(5) One (1) paint mix room (identified as PMR-3), with a maximum throughput of 23 gallons of paint per day with VOC and HAP emissions exhausted through stack S-38. PMR-3 will be constructed in 2006.

(b) One (1) powder coating booth (identified as PC-1) using an electrostatic air atomized application method, with a maximum throughput rate of 75 metal parts per hour and using a cyclone and baghouse, which are considered integral to the process.

(c) One (1) six-stage metal parts aqueous washing and zinc phosphating line, using only water, soap and zinc phosphate solutions, and consisting of the following natural gas-fired heating units:

(1) Washer-line drying oven (identified as C.U. 001) having a maximum heat input capacity of 2.5 MMBtu per hour and exhausting at stack S-8.

(2) Washer-line stage 1 burner (identified as C.U. 002) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-3.

(3) Washer-line stage 4 burner (identified as C.U. 003) having a maximum heat input capacity of 2.0 MMBtu per hour and exhausting at stack S-4.

(d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu per hour, including:

(1) Powder coat cure oven (identified as C.U. 004) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-10.

(2) Liquid spray paint cure oven (identified as C.U. 005) having a maximum heat input capacity of 1.5 MMBtu per hour and exhausting at stack S-18.

(3) North general building heater (identified as C.U. 006) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-11.

(4) Southeast general building heater (identified as C.U. 007) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-12.

(5) South general building heater (identified as C.U. 008) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-13.

(6) Wet paint room air makeup unit (identified as C.U. 009) having a maximum heat input capacity of 1.1 MMBtu per hour.

(7) Powder Paint Room air makeup unit (identified as C.U. 010) having a maximum heat input capacity of 1.1 MMBtu per hour.

(8) Warehouse area air makeup unit (identified as C.U. 011) having a maximum heat input capacity of 2.073 MMBtu per hour.

(9) Environmental room air conditioner and heater No.1 (identified as C.U. 012) having a maximum heat input capacity of 0.15 MMBtu per hour.

(10) Environmental room air conditioner and heater No. 2 (identified as C.U. 013) having a maximum heat input capacity of 0.15 MMBtu per hour.

(11) Seven (7) natural gas-fired building heaters (identified as C.U.014 through C.U.020), each with a heat input capacity of 2.50 MMBtu per hour.

(12) One (1) natural gas-fired cure oven (identified as C.U.021) with a heat input capacity of 2.50 MMBtu per hour.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5] [IC13-15-3-6(a)]

(a) This permit, 033-22778-00078, 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

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1. Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

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

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to permit no.: 033-22778-00078 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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

Request for renewal shall be submitted to:

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

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

(1) Submitted at least 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 2-6.1 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

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

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operation [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6-1-6 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 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(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 2-6.1-5(a)(2)]

C.7 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 an "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 the IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.9 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.10 Instrument Specifications [326 IAC 2-1.1-11]

(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 have a scale such that the expected normal reading 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

C.11 Response to Excursions or Exceedances

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the

emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-5] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, 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 an “authorized individual” as defined by 326 IAC 2-1.1(1).

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-5(a)(1)]

(a) Surface coating operations consisting of the following:

(1) Four (4) spray paint booths (identified as PB-1, PB-2, PB-3 and PB-4), each equipped with four (4) high volume low pressure (HVLP) spray guns used for painting steel, aluminum and plastic parts. The maximum capacity of each spray booth is 425 square feet of coating per hour, with particulate matter emissions controlled by dry filters, and exhausting at stacks S-19, S-20, S-21, and S-22. These units were constructed in 2001.

(2) Two (2) paint booths (identified as PB-5 and PB-6) equipped with two (2) high volume low pressure (HVLP) paint guns, each with a maximum throughput rate of 425 square feet of coating per hour, and exhausting at stacks S-005 and S-006. The paint booths are controlled by dry filters and were installed in 2005.

(3) Two (2) paint mix rooms (identified as PMR-1 and PMR-2), each with a maximum throughput of 23 gallons of paint per day with VOC and HAP emissions exhausted through stacks S-27 and S-33, respectively. PMR-1 and PMR-2 were constructed in 2001 and 2005, respectively.

(4) Four (4) spray paint booths (identified as PB-7, PB-8, PB-9 and PB-10), each equipped with four (4) high volume low pressure (HVLP) spray guns used for painting steel, aluminum and plastic parts. The maximum capacity of each spray booth is 425 square feet of coating per hour, with particulate matter emissions controlled by dry filters, and exhausting at stacks S-34, S-35, S-36, and S-37. These units will be constructed in 2006.

(5) One (1) paint mix room (identified as PMR-3), with a maximum throughput of 23 gallons of paint per day with VOC and HAP emissions exhausted through stack S-38. PMR-3 will be constructed in 2006.

(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 2-6.1-5(a)(1)]

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, for paint booths PB-1 through PB-10, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, less water, as delivered to the applicator at each paint booth for extreme performance coatings.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of paint booths (PB-1 through PB-10) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Particulate [326 IAC 6-3-2(d)]

(a) Particulate from the paint booths (PB-1 through PB-10) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that no overspray is visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition 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 Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit 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 VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The monthly cleanup solvent usage; and

(4) The total VOC usage for each month.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

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

SECTION D.2 EMISSIONS UNITS OPERATION CONDITIONS

Facility Description

(b) One (1) powder coating booth (identified as PC-1) using an electrostatic air atomized application method, with a maximum throughput rate of 75 metal parts per hour and using a cyclone and baghouse, which are considered integral to the process.

(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 2-6.1-5(a)(1)]

D.2.1 Particulate [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. Therefore, the particulate emissions from the powder coating booth (identified as PC-1) shall not exceed 0.551 pounds per hour.

Compliance Determination Requirements

D.2.2 Particulate Control

Pursuant to MSOP No.: 033-14280-00078, issued July 23, 2001 and in order to comply with Condition D.2.1, the cyclone and baghouse for particulate control shall be in operation and control emissions from the one (1) powder coating booth (PC-1) at all times that the one (1) powder coating booth (PC-1) is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	**Rhinehart Finishing, LLC**
Address:	**5345 County Road 68**
City:	**Spencerville, Indiana 46788**
Phone #:	**(260) 238-4442**
MSOP #:	**033-22778-00078**

I hereby certify that Rhinehart Finishing, LLC is ☐ still in operation.
☐ no longer in operation.

I hereby certify that Rhinehart Finishing, LLC is ☐ in compliance with the requirements of MSOP 033-22778-00078.
☐ not in compliance with the requirements of MSOP 033-22778-00078

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Rhinehart Finishing, LLC
Source Location:	5345 County Road 68, Spencerville, Indiana 46788
County:	DeKalb
SIC Code:	3479
Operation Permit No.:	033-14280-00078
Operation Permit Issuance Date:	July 23, 2001
Permit Renewal No.:	033-22778-00078
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from Rhinehart Finishing, LLC (Rhinehart) relating to the operation of a stationary custom coating and finishing plant.

History

On March 13, 2006, Rhinehart submitted an application to IDEM, OAQ requesting an approval to renew their Minor Source Operating Permit, to install four (4) paint booths, a paint mix room, seven (7) building heaters, and one(1) cure oven. Rhinehart also indicated they have removed the existing Pyrolysis Burn-Off Oven and the powder coating booth identified as PC-2.

The Permittee was issued Minor Source Operating Permit No.: 033-14280-00078 on July 23, 2001.

Permitted Emission Units and Pollution Control Equipment

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

(a) Surface coating operations consisting of the following:

(1) Four (4) spray paint booths (identified as PB-1, PB-2, PB-3 and PB-4), each equipped with four (4) high volume low pressure (HVLP) spray guns used for painting steel, aluminum and plastic parts. The maximum capacity of each spray booth is 425 square feet of coating per hour, with particulate matter emissions controlled by dry filters, and exhausting at stacks S-19, S-20, S-21, and S-22. These units were constructed in 2001.

(2) Two (2) paint booths (identified as PB-5 and PB-6) equipped with two (2) high volume low pressure (HVLP) paint guns, each with a maximum throughput rate of 425 square feet of coating per hour, and exhausting at stacks S-005 and S-006. The paint booths are controlled by dry filters and were installed in 2005.

(3) Two (2) paint mix rooms (identified as PMR-1 and PMR-2), each with a maximum throughput of 23 gallons of paint per day with VOC and HAP emissions exhausted through stacks S-27 and S-33, respectively. PMR-1 and PMR-2 were constructed in 2001 and 2005, respectively.

(b) One (1) powder coating booth (identified as PC-1) using an electrostatic air atomized application method, with a maximum throughput rate of 75 metal parts per hour and using a cyclone and baghouse, which are considered integral to the process.

(c) One (1) six-stage metal parts aqueous washing and zinc phosphating line, using only water, soap and zinc phosphate solutions, and consisting of the following natural gas-fired heating units:

(1) Washer-line drying oven (identified as C.U. 001) having a maximum heat input capacity of 2.5 MMBtu per hour and exhausting at stack S-8.

(2) Washer-line stage 1 burner (identified as C.U. 002) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-3.

(3) Washer-line stage 4 burner (identified as C.U. 003) having a maximum heat input capacity of 2.0 MMBtu per hour and exhausting at stack S-4.

(d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu per hour, including:

(1) Powder coat cure oven (identified as C.U. 004) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-10.

(2) Liquid spray paint cure oven (identified as C.U. 005) having a maximum heat input capacity of 1.5 MMBtu per hour and exhausting at stack S-18.

(3) North general building heater (identified as C.U. 006) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-11.

(4) Southeast general building heater (identified as C.U. 007) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-12.

(5) South general building heater (identified as C.U. 008) having a maximum heat input capacity of 0.3 MMBtu per hour and exhausting at stack S-13.

(6) Wet paint room air makeup unit (identified as C.U. 009) having a maximum heat input capacity of 1.1 MMBtu per hour.

(7) Powder Paint Room air makeup unit (identified as C.U. 010) having a maximum heat input capacity of 1.1 MMBtu per hour.

(8) Warehouse area air makeup unit (identified as C.U. 011) having a maximum heat input capacity of 2.073 MMBtu per hour.

(9) Environmental room air conditioner and heater No.1 (identified as C.U. 012) having a maximum heat input capacity of 0.15 MMBtu per hour.

(10) Environmental room air conditioner and heater No. 2 (identified as C.U. 013) having a maximum heat input capacity of 0.15 MMBtu per hour.

The following emission units were removed from the source:

(a) One (1) powder coating booth (identified as PC-2), with a maximum throughput rate of 50 pounds of powder coat per hour.

(b) Pyrolysis cleaning furnace having a maximum heat input capacity of 0.75 MMBtu per hour and a maximum processing capacity of ten (10) pounds hydrocarbon coatings per hour. Emissions are controlled using an afterburner, which exhausts at stack S-28.

New Emission Units and Pollution Control Equipment

The application includes information relating to construction and operation of the following equipment:

(a) Surface coating operations consisting of the following:

. . .

(4) Four (4) spray paint booths (identified as PB-7, PB-8, PB-9 and PB-10), each equipped with four (4) high volume low pressure (HVLP) spray guns used for painting steel, aluminum and plastic parts. The maximum capacity of each spray booth is 425 square feet of coating per hour, with particulate matter emissions controlled by dry filters, and exhausting at stacks S-34, S-35, S-36, and S-37. These units will be constructed in 2006.

(5) One (1) paint mix room (identified as PMR-3), with a maximum throughput of 23 gallons of paint per day with VOC and HAP emissions exhausted through stack S-38. PMR-3 will be constructed in 2006.

. . .

(d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu per hour, including:

. . .

(11) Seven (7) natural gas-fired building heaters (identified as C.U.014 through C.U.020), each with a heat input capacity equal to 2.50 MMBtu per hour.

(12) One (1) natural gas-fired cure oven (identified as C.U.021), with a heat input capacity equal to 2.50 MMBtu per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

The source has been operating under MSOP No. 033-14280-00078, issued July 23, 2001 and the previous approvals including, but not limited to, the following:

(a) Notice Only Change No.: 033-20649-00078, issued on March 14, 2005; and

(b) Notice Only Change No.: 033-21859-00078, issued on October 20, 2005.

All conditions from previous approvals were incorporated into this permit except the following MSOP No.: 033-14280-00078, issued July 23, 2001:

(a) Condition D.3.1: Provisions of 326 IAC 4-2 (Incinerator) for the Pyrolysis Cleaning Furnace:

Reason not incorporated: The Permittee has removed this unit.

(b) After extensive evaluation and deliberation, IDEM has concluded that certain permit conditions that are routinely appealed in a permit could be altered in a manner that would be less burdensome on the Permittee but would still ensure that sources can demonstrate compliance with State and Federal Regulations on a continuous basis. These changes are reflected in Sections B and C of the MSOP Renewal. Additional

changes have been made to the permit as a result of administrative changes and changes to Federal and State regulations.

Air Pollution Control Justification as an Integral Part of the Process

Pursuant to MSOP No.: 033-14280-00078, issued July 23, 2001, IDEM, OAQ has determined that one (1) cylcone and (1) baghosue used in conjunction with the one (1) powder coating process, are considered as an integral part of the process:

(a) The powder coating booth system draws powder from the application equipment over the parts with excess powder collected in a powder recovery system that consists of a cyclone and baghouse. This system is designed to be operated with the cyclone and baghouse as an integral part of the process.

(b) This powder coating system cannot be operated without the powder recovery system because the amount of powder lost during the process would make this coating method prohibitively expensive.

IDEM, OAQ has re-evaluated the justifications and agreed that the one (1) cyclone and one (1) baghouse will continue to be considered as an integral part of the powder coating process. Therefore, the permitting level will be determined using the potential to emit after the air pollution control equipment. Operating conditions in the proposed permit will specify that this air pollution control equipment shall operate at all times when the powder coating process is in operation.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (F)
S-19 through S-32	Paint Booths (PB-1 through PB-4)	18	30	8,000	Ambient
S-5 through S-6	Paint Booths (PB-5 through PB-6)	24	30	12,000	Ambient
S-34 and S-37	Paint Booths (PB-7 through PB-10)	19	24	5,350	Ambient
S-27	Paint Mix Room 1	16.5	12	1,930	Ambient
S-33	Paint Mix Room 2	18	12	1,930	Ambient
S-38	Paint Mix Room 3	18	14	1,930	Ambient

Recommendation

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

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

A complete application for the purposes of this review was received on March 13, 2006. Additional information was received on May 5, 2006, May 23, 2006, and June 9, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 11).

Potential to Emit of the Source Before Controls (Including New Construction)

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

Pollutant	Potential to Emit (tons/year)
PM	15.4
PM10	16.4
SO_2	0.10
VOC	25.7
CO	13.9
NO_x	16.5

HAPs	Potential to Emit (tons/year)
Xylene	5.99
Toluene	4.91
MEK	3.92E-03
Ethylbenzene	1.12
MIK	3.45
Benzene	2.47E-04
Dichlorobenzene	1.98E-04
Formaldehyde	1.24E-02
Hexane	2.97E-01
HMDI	2.35E-06
Total	15.8

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A MSOP will be issued.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the requirements of 326 IAC 2-7 (Part 70 Permit Program).

(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 since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Dekalb County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) DeKalb County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 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 – Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) emissions are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for Ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to Ozone. DeKalb County has been designated as attainment or unclassifiable for Ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Dekalb 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 – Entire Source section.

(d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

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/year)*
PM	44.4
PM10	44.4
SO_2	0.05
VOC	48.4
CO	6.42
NO_x	7.60
Single HAP	Less than 10
Combination HAPs	Less than 25

*Emissions from existing units.

(a) This existing source is not a major stationary source because no regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.

(b) The above emissions were based on the potential to emit for the source as shown in Appendix A, and the Notice Only Change to MSOP No.: 033-20649-00078, issued March 14, 2005.

Note: During the processing of the MSOP renewal (this permit), the Permittee submitted revised potential to emit calculations for all spray coating booths at the source based on their maximum usage rates and the material safety data sheets (MSDS). Due to the updated information, the potential to emit of each criteria pollutant from the existing units is now reduced from what was previously described in the Notice Only Change to MSOP, issued March 14, 2005.

Proposed Modification

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

Pollutant	Potential To Emit (tons/year)						
	PM	PM10	SO_2	VOC	CO	NOx	HAPs
Proposed Modification	6.85	7.34	0.05	11.4	7.21	8.59	7.04
Existing Units	8.60	9.05	0.05	14.3	6.66	7.93	8.74
Total After Modification	15.4	16.4	0.10	25.7	13.9	16.5	15.8

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

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

(a) each criteria pollutant is less than 100 tons per year,

(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and

(c) any combination of HAPs is less than 25 tons per year.

This is the fourth air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for to this source.

(c) The requirements of 40 CFR 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning (326 IAC 14) are not included in the permit for this source because the source does not use halogenated solvents in their aqueous washer unit.

(d) The requirements of 40 CFR 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products are not included in this permit. This source is not a major source of hazardous air pollutants.

State Rule Applicability – Entire Source

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

Rhinehart Finishing, LLC was constructed in 2001 and it is not in one of the twenty-eight (28) source categories. At the time of construction and subsequent modifications in 2005 (addition of two paint booths PB-5 and PB-6, and addition of one (1) paint mix room PMR-2), the potential to emit of all criteria pollutants remained less than the 250 tons per year threshold for PSD. The Permittee submitted an application on March 13, 2006 requesting approval for the installation of four (4) paint booths, and removal of the existing Pyrolysis Burn-off Oven and power coating

booth (identified as PC-2). After this modification, the potential to emit of all criteria pollutants continue to remain less than the 250 tons per year PSD threshold. Therefore, the provisions of 326 IAC 2-2 (PSD) do not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to the provisions of 326 IAC 2-6 (Emission Reporting) because it is located in DeKalb County and is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Furthermore, the potential to emit of lead is less than five (5) tons per year.

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 (Major Sources of Hazardous Air Pollutants (HAP))

This stationary custom coating and finishing plant will continue to have a potential to emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs after the addition of the new spray paint booths, paint mix room, and cure oven. Therefore, the provisions of 326 IAC 2-4.1 do not apply.

State Rule Applicability – Paint Booths (PB-1 through PB-10)

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

The ten (10) spray booths, including four (4) new paint spray booths, are subject to the provisions of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because the coating usage in each of the spray booths is equal to or greater than five (5) gallons per day.

(a) Particulate from the paint booths (identified as PB-1 through PB-10) shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

The provisions of 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) are not applicable to the paint booths PB-1 through PB-10 because the potential VOC emissions for each spray booth are less than 25 tons per year.

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

The provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are applicable to the spray paint booths PB-1 through PB-10 because they were constructed after July 1, 1990 and have actual VOC emissions greater than fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), for paint booths (PB-1 through PB-10), the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenth (3.5) pounds of VOC per gallon of coating less water, as delivered to the applicator of each paint booth, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the paint booths (PB-1 through PB-10) are in compliance with this rule.

State Rule Applicability – Three (3) Paint Mix Rooms

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

Although constructed after January 1, 1980, the provisions of 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) are not applicable to the three (3) paint mix rooms because the potential VOC emissions from each of these rooms are less than twenty-five (25) tons per year.

State Rule Applicability – Powder Coating Booth (PC-1)

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

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. Therefore, the particulate emissions from the powder coating booth (identified as PC-1) shall not exceed 0.551 pound per hour.

The cyclone and the baghouse shall be in operation at all times the powder coating booth (PC-1) is in operation, in order to comply with this rule.

326 IAC 8 (Volatile Organic Compound Rules)

Since no volatile organic compounds are used or produced in the powder coating operation, the powder coating booth PC-1 is not subject to any Article 8 rules.

State Rule Applicability – Metal Parts Aqueous Washing and Zinc Phosphating Line

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The metal parts aqueous washing and zinc phosphating line use only water, soap and zinc phosphate solutions, and contain no organic solvents. Therefore, this line is not subject to the provisions of 326 IAC 8-3.

State Rule Applicability – Natural Gas-Fired Combustion Units

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

The natural gas-fired combustion units consisting of one (1) drying oven, two (2) burners, three (3) cure ovens, twelve (12) building heaters, three (3) air make-up units, and two (2) air conditioners are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because according to 326 IAC 6-3-1(b)(14) manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of this rule.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired combustion units consisting of one (1) drying oven, two (2) burners, three (3) cure ovens, twelve (12) building heaters, three (3) air make-up units, and two (2) air conditioners are not subject to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are not indirect heating units.

Compliance Monitoring Requirements

There are no compliance monitoring requirements included in this permit for this source.

Conclusion

The operation of this stationary custom coating and finishing plant shall be subject to the conditions of the Minor Source Operating Permit Renewal No. 033-22778-00078.

Appendix A: Emission Calculations
Natural Gas-Fired Combustion Units

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Heat Input Capacity MMBtu/hour	Potential Throughput MMSCF/year
38.5	330

Pollutant

	PM*	PM10*	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMSCF)	1.9	7.6	0.60	100	5.5	84.0
Potential To Emit (tons/year)	0.31	1.26	0.10	16.52	0.91	13.88

* PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM and PM10 combined.
** Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF.

All Emission factors are based on normal firing.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, and 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

METHODOLOGY
Potential Throughput (MMscf/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMscf/1020 MMBtu
PTE (tons/year) = Potential Throughput (MMscf/year) * Emission Factor (lb/MMscf) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas-Fired Combustion Units

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	3.47E-04	1.98E-04	1.24E-02	2.97E-01	5.62E-04

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	8.26E-05	1.82E-04	2.31E-04	6.28E-05	3.47E-04

Methodology is the same as previous page.
The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC and Particulate Emissions
From Paint Booths (PB-1 through PB-4)

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Units ID	Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Material (gal/unit)	Max. Throughput (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	** Transfer Efficiency
PB-1	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	3.34	3.34	0.21	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.27	3.27	0.41	1.80	1.06	75%
PB-2	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	3.34	3.34	0.21	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.27	3.27	0.41	1.80	1.06	75%
PB-3	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	3.34	3.34	0.21	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.27	3.27	0.41	1.80	1.06	75%
PB-4	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	3.34	3.34	0.21	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.27	3.27	0.41	1.80	1.06	75%
											TOTAL		**10.9**	**6.69**	

* Coating is applied using one (1) HVLP spray gun per paint booth, and only one (1) primer and one (1) top coat is applied per paint booth at a given time.
** Transfer efficiency for coating flat surface (AP-40, pages 859-861).

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % Organics * 1/(1-Volume % water)
Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics
PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour)
PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Max. Throughput (units/hour) * Gal of Material (gal/unit) * Density (lb/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations
From Paint Booths (PB-1 through PB-4)

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethylbenzene
PB-1	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-2	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-3	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-4	Primer	12.1	0.00015	425	0.0%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	PTE Xylene (tons/year)	PTE Toluene (tons/year)	PTE Methyl Isobutyl Ketone (tons/year)	PTE Ethylbenzene (tons/year)
PB-1	Primer	See Above			0.00	0.24	0.08	0.00
	Top Coat				0.67	0.30	0.30	0.12
PB-2	Primer				0.00	0.24	0.08	0.00
	Top Coat				0.67	0.30	0.30	0.12
PB-3	Primer				0.00	0.24	0.08	0.00
	Top Coat				0.67	0.30	0.30	0.12
PB-4	Primer				0.00	0.24	0.08	0.00
	Top Coat				0.67	0.30	0.30	0.12
				TOTAL	**2.66**	**2.18**	**1.53**	**0.50**

Highest Single HAP (Xylene) in tons per year = 2.66
Combination of HAPs in tons per year = 6.87

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum Thoughput (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate Emissions
From Paint Booths (PB-5 and PB-6)

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Units ID	Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Material (gal/unit)	Max. Throughput (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	** Transfer Efficiency
PB-5	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	3.34	3.34	0.21	0.93	0.61	75%
PB-6	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.27	3.27	0.41	1.80	1.06	75%
											TOTAL		**2.73**	**1.67**	

* Coating is applied using one (1) HVLP spray gun per paint booth, and only one (1) primer and one (1) top coat is applied per paint booth at a given time.
** Transfer efficiency for coating flat surface (AP-40, pages 859-861).

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % Organics * 1/(1-Volume % water)
Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics
PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour)
PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Max. Throughput (units/hour) * Gal of Material (gal/unit) * Density (lb/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations
From Paint Booths (PB-5 and PB-6)

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethylbenzene
PB-5	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
PB-6	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	PTE Xylene (tons/year)	PTE Toluene (tons/year)	PTE MEK (tons/year)	PTE Ethylbenzene (tons/year)
PB-5	Primer	See Above			0.00	0.24	0.08	0.00
PB-6	Top Coat				0.67	0.30	0.30	0.12
				TOTAL	**0.67**	**0.55**	**0.38**	**0.12**

Highest Single HAP (Xylene) in tons per year = 0.67
Combination of HAPs in tons per year = 1.72

METHODOLOGY
PTE of HAPs (tons/year) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum Thoughput (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate Emissions
From Paint Booths (PB-7 through PB-10)

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Units ID	Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Material (gal/unit)	Max. Throughput (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	** Transfer Efficiency
PB-7	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	3.34	3.34	0.21	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.27	3.27	0.41	1.80	1.06	75%
PB-8	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	3.34	3.34	0.21	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.27	3.27	0.41	1.80	1.06	75%
PB-9	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	3.34	3.34	0.21	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.27	3.27	0.41	1.80	1.06	75%
PB-10	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	3.34	3.34	0.21	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.27	3.27	0.41	1.80	1.06	75%
											TOTAL		**10.9**	**6.69**	

* Coating is applied using one (1) HVLP spray gun per paint booth, and only one (1) primer and one (1) top coat is applied per paint booth at a given time.
** Transfer efficiency for coating flat surface (AP-40, pages 859-861).

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % Organics * 1/(1-Volume % water)
Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics
PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour)
PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Max. Throughput (units/hour) * Gal of Material (gal/unit) * Density (lb/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations
From Paint Booths (PB-7 through PB-10)

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethylbenzene
PB-7	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-8	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-9	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-10	Primer	12.1	0.00015	425	0.0%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	PTE Xylene (tons/year)	PTE Toluene (tons/year)	PTE Methyl Isobutyl Ketone (tons/year)	PTE Ethylbenzene (tons/year)
PB-7	Primer	See Above			0.00	0.24	0.08	0.00
	Top Coat				0.67	0.30	0.30	0.12
PB-8	Primer				0.00	0.24	0.08	0.00
	Top Coat				0.67	0.30	0.30	0.12
PB-9	Primer				0.00	0.24	0.08	0.00
	Top Coat				0.67	0.30	0.30	0.12
PB-10	Primer				0.00	0.24	0.08	0.00
	Top Coat				0.67	0.30	0.30	0.12
				TOTAL	**2.66**	**2.18**	**1.53**	**0.50**

Highest Single HAP (Xylene) in tons per year = 2.66
Combination of HAPs in tons per year = 6.87

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum Thoughput (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
Paint Mix Rooms

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Pit ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Partial Vapor Pressure of Paint Components used at Rhinehart Finishing
Liquid Paint Coatings & Supplemental Paint Mix Room Data

HAPS Volatile Component	VP_x (psi)	VP_x (mmHg)	Diffusion (Dx) Coefficients (cm^2/sec)	Diffusion (Dx) Coefficients (ft^2/sec)	MW (lb/Mole)	New PMR % Component (Ave)	Existing PMR % Component (Ave)
Toluene	0.60808	31.44700	0.08287	0.00009	92	9.7	6.0
MIBK	0.16133	8.33300	0.07660	0.00008	100	12.7	0.0
MEK	1.93370	100.00000	0.06960	0.00007	72	4.0	6.0
Xylenes	0.17708	9.15751	0.07560	0.00008	106	3.7	1.9
Ethylbenzene	0.18665	9.65250	0.07560	0.00008	106	0.7	0.0
HMDI	0.01934	<1	0.01410	0.00002	>250	7.3	0.3
1,2,4-Trimethylbenzene	0.09535	4.93100	0.06510	0.00007	120	0.0	0.0

General Emission Calculation Factors

Pressure	1	atm
Temperature (T)	25	C
	77	F
	537	R
Paint Mix Room Exhaust	1930	cu.ft/min
Paint Mix Room SA	64	sq.ft
Velocity (U)	0.34	Miles/Hr
Paint Can Volume	5.00	gallons
Paint Can Diameter	12	Inches
Paint Can Surface Area (A)	0.785	sq.ft
Paint Usage, Total	46	gallons/day
Batch Events	5	Batch/Day/PMR
Annual Events (B)	1300	Batch/Year/PMR
Time of Events (H)	0.5	Hr/Batch/PMR
Universal Gas Constant (R)	10.73	psi-ft^3/R-lb mole
Pouring Factor (Agitation)	2	Dimensionless

Gas Phase Mass Transfer Coefficient (K_x) for VOC compound x (VOC_x)

HAPS Volatile Component	Gas Phase Mass Transfer Coefficient (K_x) (ft/sec)
Toluene	0.000828
MIBK	0.000786
MEK	0.000737
Xylenes	0.000779
Ethylbenzene	0.000779
HMDI	0.000254
1,2,4-Trimethylbenzene	0.000705

Emission Model for Surface Evaporation - Paint Mix Rooms
Potential to Emit (PTE)

HAPS Volatile Component	Emission (lb/yr/PMR) E_x	Emission (ton/yr/PMR) E_x	Total Emission (lb/yr) E_x	Total Emission (ton/yr) E_x
Toluene	29.533787	1.477E-02	88.601362	4.430E-02
MIBK	8.081774	4.041E-03	24.245321	1.212E-02
MEK	65.428474	3.271E-02	196.285422	9.814E-02
Xylenes	9.320995	4.660E-03	27.962985	1.398E-02
Ethylbenzene	9.824733	4.912E-03	29.474199	1.474E-02
HMDI	0.783636	3.918E-04	2.350907	1.175E-03
1,2,4-Trimethylbenzene	5.142745	2.571E-03	15.428234	7.714E-03
Summation				**0.19**

References:
Diffusion Coefficients Calculations, USEPA, www.epa.gov/athens/learn2model/part-two/onsite/estdiffusion
USEPA, Emission Inventory Improvement Program, Volume II, Chapter 8, 02/2005

Emission Model for Surface Evaporation
Potential to Emit (PTE) - Based on Known Average Component Percentage

HAPS Volatile Component	New PMR Emission (lb/yr/PMR) E_x	New PMR Emission (ton/yr/PMR) E_x	Existing PMR Emission (lb/yr/PMR) E_x	Existing PMR Emission (ton/yr/PMR) E_x
Toluene	2.864777	1.432E-03	3.544054	1.772E-03
MIBK	1.026385	5.132E-04	0.000000	0.000E+00
MEK	2.617139	1.309E-03	7.851417	3.926E-03
Xylene	0.344877	1.724E-04	0.354198	1.771E-04
Ethylbenzene	0.068773	3.439E-05	0.000000	0.000E+00
HMDI	0.057205	2.860E-05	0.004702	2.351E-06
Summation				**0.01**

References:
Diffusion Coefficients Calculations, USEPA, www.epa.gov/athens/learn2model/part-two/onsite/estdiffusion
USEPA, Emission Inventory Improvement Program, Volume II, Chapter 8, 02/2005

Appendix A: Emission Calculations
Powder Coating (PC-1)

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Process	Max. Usage Rate (gal/unit)	Max. Units (units/hour)	Coating Density (lb/gal)	Solids Content (%)	PTE of PM/PM10 (tons/year)	Transfer Efficiency (tons/year)**	Process Control Efficiency (%)	PTE of PM/PM10 (tons/year)
Powder Coat Booth	0.00703	75	14.2	100%	8.20	75%	99%	0.08

* Pursuant to MSOP No.: 033-14280-00078, issued July 23, 2001, the powders are collected by the filter and recycled to the process.
** Transfer efficiency for coating flat surface using electrostatic air atomized (AP-40, pages 859-861).

METHODOLOGY
PTE of PM/PM10 (tons/year) after integral controls = Max. Usage Rate (gal/unit) * Max. Throughput (units/hour) * Coating Density (lb/gal) * Solids Content (%) * Process Control Efficiency (%)

Appendix A: Emission Calculations
Summary

Company Name: Rhinehart Finishing, L.L.C.
Address: 5345 County Road 48, Spencerville, Indiana 46788
MSOP Renewal: 033-22778
Plt ID: 033-00018
Reviewer: ERG/SD
Date: June 30, 2006

Emission Units	PM	PM10	SO_2	NO_X	VOC	CO	Combination of HAPs
* Combustion Units	0.31	1.26	0.10	16.5	0.91	13.88	3.11E-01
PB-1 through PB-4	6.69	6.69	0.00	0.00	10.9	0.00	6.87
PB-5 and PB-6	1.67	1.67			2.73		1.72
PB-7 through PB-10	6.69	6.69			10.9		6.87
Paint Mix Rooms**					0.19		0.01
Powder Coat Booth	0.08	0.08					
TOTAL	**15.4**	**16.4**	**0.10**	**16.5**	**25.7**	**13.9**	**15.8**

* Combustion Units = 1 Drying Oven, 2 Burners, 3 Cure Ovens, 12 Bldg Heaters, 3 Air Make-Up Units, 2 Air Conditioners
** VOC and HAP emissions calculated for the spray booths includes any losses from paint mixing rooms. Therefore, the estimate of VOC and HAPs emitted in the paint mix rooms during paint mixing and pouring activities are not included in the total.