



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: June 16, 2006
RE: Imperial Marble / 143-22974-00017
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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

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

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

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

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

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

Enclosures
FNPER-AM.dot 03/23/06



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 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Steve Hutton
Imperial Marble Inc.
190 N Main Street
Scottsburg, IN 47170

June 16, 2006

Dear Mr. Hutton

Re: Exempt Construction and Operation Status,
143-22974-00017

The application from Imperial Marble Inc., received on March 14, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following cultured marble manufacturing operation, to be located at 190 N Main Street, Scottsburg, IN 47170, is classified as exempt from air pollution permit requirements:

- (a) One (1) gel coat spray booth, with a maximum capacity of 0.63 pounds of gel coat per hour;
- (b) One (1) resin spray booth, with a maximum capacity of 23.55 pounds of resin per hour; and
- (c) One (1) catalyst spray booth, with a maximum capacity of 0.14 pounds of catalyst per hour.

The following conditions shall be applicable:

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

This exemption is the first air approval issued to this source.

Imperial Marble Inc.
Scottsburg, Indiana
Permit Reviewer: GSN/EVP

Page 2 of 2
E 143-22974-00017

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed By:
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

GSN/EVP

cc: File - Scott County
Scott County Health Department
Air Compliance - Jennifer Schick
Permit Tracking
Compliance Data Section

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Imperial Marble Inc.
Source Location:	190 N Main Street, Scottsburg, IN 47170
County:	Scott
SIC Code:	3088
Operation Permit No.:	143-22974-00017
Permit Reviewer:	Ganesh Srinivasan/EVP

The Office of Air Quality (OAQ) has reviewed an application from Imperial Marble Inc. relating to operation of open molding cultured marble manufacturing unit.

New Emission Units and Pollution Control Equipment

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

- (a) One (1) gel coat spray booth, with a maximum capacity of 0.63 pounds of gel coat per hour;
- (b) One (1) resin spray booth, with a maximum capacity of 23.55 pounds of resin per hour; and
- (c) One (1) catalyst spray booth, with a maximum capacity of 0.14 pounds of catalyst per hour.

Existing Approvals

There have been no previous approvals issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

A complete application for the purposes of this review was received on March 14, 2006.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (Page 1 of 1).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	< 5
PM-10	< 5
SO ₂	< 10
VOC	< 10
CO	< 25
NO _x	< 10

HAPs	Potential to Emit (tons/yr)
Styrene	4.57
MEK	0.01
Total	4.58

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (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 Scott County.

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

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Scott 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 PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Scott County has been classified as attainment or unclassifiable in Indiana for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new 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 first 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 this review.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this review.

State Rule Applicability – Entire Source

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

This source is not a major source for Prevention of Significant Deterioration, 326 IAC 2-2. No attainment regulated pollutant has the potential to emit at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source does not have potential to emit 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

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

The spray booths are not subject to this rule because the potential emissions of particulates from each of the spray booths are less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3 (b)(14), the requirements of this rule do not apply.

326 IAC 8-1-6 (General VOC Reduction Requirements)

The resin casting operation and the gel coat spray booth are not subject to 326 IAC 8-1-6 (General Reduction Requirements) because the potential to emit volatile organic compounds is less than twenty-five (25) tons per year. Therefore, the BACT (best available control technology) requirements do not apply.

No other article 8 rules applies.

Conclusion

The operation of this open molding cultured marble manufacturing unit shall be subject to the conditions of the Exemption 143-22974-00017.

**Appendix A: Emissions Calculations
VOC and HAP Emissions
Cultured Marble Operation**

Company Name: Imperial Marble Inc.
Address City IN Zip: 190 N Main, Scottsburg, IN 47170
Permit Number: 143-22974-00017
Plt ID: 143-00017
Reviewer: GSN/EVP
Date: 05/10/06

Application Method	Coatings	Density	Max. Prod. Rate	Max. Coating Usage	Max. Usage	Weight Percent Styrene	* Emission Factor Styrene	PTE of Styrene (VOC)	Weight Percent MMA	* Emission Factor MMA	PTE of MMA	Weight Percent MEK	** Emission Factor MEK	PTE of MEK	Particulate Potential (ton/yr)	Transfer Efficiency
		lbs/gal	unit/hr	gal/unit	lbs/hr		lbs/ton	tons/yr		lbs/hr	tons/yr		lbs/ton	tons/yr		
Manual Atomized	Gel Coat	8.77	1	0.072	0.63	49.00%	340.00	0.47	0.00%	-	0	0.00%	-	-	0.70	50%
Manual	Resin	10.02	1	2.350	23.55	31.50%	79.38	4.09	0.00%	-	0	0.00%	-	-	0.00	100%
Manual	Catalyst	8.35	1	0.140	0.14	0.00%	0.00	0.00	0.00%	-	0	2.00%	2000	0.01	0.00	100%
Total							4.5631			Total	0.00		Total	0.0120	0.70	

* The emission factor for resin and gel coat are based on "Unified Emission Factors for Open Molding of Composites" (July 23, 2001)

** The emission factor for MEK is 2000 lb/ton * weight % MEK (assumes 100% is evaporated in process)

Total 4.58

Methodology:

Potential to Emit HAPs (tons/yr) = Max. Usage (lbs/yr) * 8760 hrs/yr * 1 ton/200 lbs * Emission Factor (lbs/ton) * 1 ton/2000 tons