



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: January 4, 2008
RE: J.P., Inc., dba Jasper Plastics Solutions / 037-23290-00085
FROM: Matthew Stuckey, Deputy Branch 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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**J.P., Inc. d/b/a Jasper Plastics Solutions
1220 Power Drive
Jasper, Indiana 47546**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T037-23290-00085	
Issued by: <i>Original document signed by</i> Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: January 4, 2008 Expiration Date: January 4, 2013

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wood furniture manufacturing operation.

Source Address:	1220 Power Drive, Jasper, IN 47546
Mailing Address:	1220 Power Drive, Jasper, IN 47546
General Source Phone Number:	(812) 481-2760
SIC Code:	2519, 3089
County Location:	Dubois
Source Location Status:	Nonattainment for Particulate Matter (PM2.5) Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD and Nonattainment NSR Rules Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Sixteen (16) spray booths, identified as Nos. 1 through 16, constructed in 1984, using HVLP guns to coat molded plastic or wood parts, using water pans for spray booths (SB2 through SB6, SB11, SB12 and SB14 through SB16) and dry filters for spray booths (SB1, SB7 through SB10 and SB13) for particulate control, and exhausting to stacks identified as Nos. 1 through 16.
- (b) Ten (10) spray booths, identified as Nos. 17 through 26, constructed in 1990, using HVLP guns to coat molded plastic or wood parts, using water pans for spray booths (SB17 through SB25) and dry filters for spray booth (SB26) for particulate control, and exhausting to stacks identified as Nos. 17 through 26.
- (c) Two (2) spray booths, identified as booth I&K and booth 30, constructed in 1994, using HVLP guns to coat molded plastic or wood parts, using water pans for spray booth (SB30) and dry filters for spray booth (I&K) for particulate control, and exhausting to stacks identified as Nos. 30 through 31.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6.5-1-2]

- (1) One (1) Donaldson Day 156-RFH-10 unit with gas flow rate of 4000 actual cubic per feet minute;
 - (2) One (1) Torit Day 276 RFW unit, with gas flow rate of 4000 actual cubic feet per minute; and
 - (3) One (1) canister type Murphy Rodgers – MRAL-14 unit, use in the sample shop area with gas flow rate of 4000 actual cubic feet minute, and venting inside the building.
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (c) Other activities or categories below insignificant thresholds:
- (1) One (1) dust collector with a maximum throughput capacity of 6,000 CFM. This is a small unit used only for the sample shop. [326 IAC 6.5-1-2]
 - (2) hand held sanders and grinders. [326 IAC 6.5-1-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T037-23290-00085, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). 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 [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" 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) The "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T037-23290-00085 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade emissions increases and decreases at in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

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

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

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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). 326 IAC 6-4-2(4) is not federally enforceable.

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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-7-6(1)]

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on March 28, 2002.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.17 General Record Keeping Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Sixteen (16) spray booths, identified as Nos. 1 through 16, constructed in 1984, using HVLP guns to coat molded plastic or wood parts, using water pans for spray booths (SB2 through SB6, SB11, SB12 and SB14 through SB16) and dry filters for spray booths (SB1, SB7 through SB10 and SB13) for particulate control, and exhausting to stacks identified as Nos. 1 through 16.
- (b) Ten (10) spray booths, identified as Nos. 17 through 26, constructed in 1990, using HVLP guns to coat molded plastic or wood parts, using water pans for spray booths (SB17 through SB25) and dry filters for spray booth (SB26) for particulate control, and exhausting to stacks identified as Nos. 17 through 26.
- (c) Two (2) spray booths, identified as booth I&K and booth 30, constructed in 1994, using HVLP guns to coat molded plastic or wood parts, using water pans for spray booth (SB30) and dry filters for spray booth (I&K) for particulate control, and exhausting to stacks identified as Nos. 30 through 31.

(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 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets by spray booths (SB17 through SB26, SB30 and I&K) shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to T037-6952-00085, issued on March 28, 2002, the total source-wide usage of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents shall be limited to less than 250 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the potential to emit of VOC from the source, including insignificant activities, to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and First Significant Permit Modification No. 037-16032-00085, issued on March 6, 2003, J.P., Inc. d/b/a Jasper Plastics Solutions shall, during all periods when coating molded plastic parts, apply all coating materials using airless spray application, air-assisted airless spray application, or high-volume low-pressure (HVLP) spray application. Compliance with these conditions shall satisfy the requirements of 326 IAC 8-1-6 (BACT).

D.1.4 Single and Combined Hazardous Air Pollutant (HAP) Limits

The entire source (including wood and plastic coating and solvent) single and combined HAP potential to emit shall be limited to less than 10 and 25 tons per consecutive 12 month period, with compliance determined at the end of each month. These limits shall ensure that there are no applicable requirements under NESHAP (40 CFR 63, Subpart WWWW) – Standards for Reinforced Plastic Composites Production, NESHAP (40 CFR 63, Subpart PPPP) – Standards for Plastic Parts and Products Surface Coating and 40 CFR 43 (NESHAP, Subpart JJ) – Standards for Wood Furniture Manufacturing.

D.1.5 Particulate Limitations - Dubois County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2 (Nonattainment Area Particulate Limitations) the particulate matter (PM) from the spray booths (SB1 through SB26, SB30 and I&K) shall be limited to 0.03 grains per dry standard cubic foot.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.7 Particulate [326 IAC 6.5-1-2]

The particulate from the spray booths (SB1 through SB26, SB30 and I&K) shall be controlled by the dry particulate filters and waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.2 and D.1.4 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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booths (SB1, SB7 through SB10, SB13, SB26 and I&K) stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the spray booths (SB2 through SB6, SB11, SB12, SB14 through SB25 and SB30) stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.1.2 and D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount of coating material and solvent less water used on a 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.
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC, single HAP and total HAPs usages for each month; and
 - (4) The weight of VOCs , single HAP and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	Insignificant Activities
(a)	Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6.5-1-2]
(1)	One (1) Donaldson Day 156-RFH-10 unit with gas flow rate of 4000 actual cubic per feet minute;
(2)	One (1) Torit Day 276 RFW unit, with gas flow rate of 4000 actual cubic feet per minute; and
(3)	One (1) canister type Murphy Rodgers – MRAL-14 unit, use in the sample shop area with gas flow rate of 4000 actual cubic feet minute, and venting inside the building.
(b)	Other activities or categories below insignificant thresholds:
(1)	One (1) dust collector with a maximum throughput capacity of 6,000 CFM. This is a small unit used only for the sample shop. [326 IAC 6.5-1-2]
(2)	hand held sanders and grinders. [326 IAC 6.5-1-2]
(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 2-7-5(1)]

D.2.1 Particulate [326 IAC 6.5-1-2]

The particulate matter (PM) from the grinding and machining operations shall be limited to 0.03 grains per dry standard cubic foot.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 1220 Power Drive, Jasper, IN 47546
Mailing Address: 1220 Power Drive, Jasper, IN 47546
Part 70 Permit No.: T037-23290-00085

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 1220 Power Drive, Jasper, IN 47546
Mailing Address: 1220 Power Drive, Jasper, IN 47546
Part 70 Permit No.: T037-23290-00085

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
X The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 1220 Power Drive, Jasper, IN 47546
Mailing Address: 1220 Power Drive, Jasper, IN 47546
Part 70 Permit No.: T037-23290-00085
Facility: Source-wide
Parameter: VOC
Limit: The total source-wide usage of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents shall be limited to less than 250 tons per 12 consecutive month period with compliance determined at the end of each month

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
 Source Address: 1220 Power Drive, Jasper, IN 47546
 Mailing Address: 1220 Power Drive, Jasper, IN 47546
 Part 70 Permit No.: T037-23290-00085
 Facility: Source-wide
 Parameter: Single HAP and total HAP
 Limit: Source-wide single and total HAP usages shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 1220 Power Drive, Jasper, IN 47546
Mailing Address: 1220 Power Drive, Jasper, IN 47546
Part 70 Permit No.: T037-23290-00085

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

**Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit**

Source Background and Description

Source Name:	J.P., Inc. d/b/a Jasper Plastics Solutions
Source Location:	1220 Power Drive, Jasper, IN 47546
County:	Dubois
SIC Code:	2519, 3089
Operation Permit No.:	T037-23290-00085
Permit Reviewer:	Alic Bent/EVP

On November 12, 2007, the Office of Air Quality (OAQ) had a notice published in the Herald, Jasper, Indiana, stating that J.P., Inc. d/b/a Jasper Plastics Solutions had applied for a Part 70 permit renewal for the operation of a wood furniture manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review IDEM, OAQ has made the following changes to the Part 70 permit renewal (additions in **bold**, deletions in ~~strikeout~~):

1. IDEM, OAQ has revised the cover page of the permit as shown below:

Operation Permit No.: T037-23290-00085	
Issued by: Nisha Sizemore, Chief Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

Indiana Department of Environmental Management

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	J.P., Inc. d/b/a Jasper Plastics Solutions
Source Location:	1220 Power Drive, Jasper, IN 47546
County:	Dubois
SIC Code:	2519, 3089
Permit Renewal No.:	T037-23290-00085
Permit Reviewer:	AB/EVP

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from J.P., Inc. d/b/a Jasper Plastics Solutions relating to the operation of a stationary source which manufactures molded plastic and wood parts.

Permitted Emission Units and Pollution Control Equipment

- (a) Sixteen (16) spray booths, identified as Nos. 1 through 16, constructed in 1984, using HVLP guns to coat molded plastic or wood parts, using water pans for spray booths (SB2 through SB6, SB11, SB12 and SB14 through SB16) and dry filters for spray booths (SB1, SB7 through SB10 and SB13) for particulate control, and exhausting to stacks identified as Nos. 1 through 16.
- (b) Ten (10) spray booths, identified as Nos. 17 through 26, constructed in 1990, using HVLP guns to coat molded plastic or wood parts, using water pans for spray booths (SB17 through SB25) and dry filters for spray booth (SB26) for particulate control, and exhausting to stacks identified as Nos. 17 through 26.
- (c) Two (2) spray booths, identified as booth I&K and booth 30, constructed in 1994, using HVLP guns to coat molded plastic or wood parts, using water pans for spray booth (SB30) and dry filters for spray booth (I&K) for particulate control, and exhausting to stacks identified as Nos. 30 through 31.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

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

Insignificant Activities

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

- (a) Activities or categories of activities with individual HAP emissions not previously identified as any unit emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) tons per year of a single HAP:
 - (1) plastics molding polymer crosslinking. Free styrene emission less than 0.5 tons per year.

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6.5-1-2]
 - (1) One (1) Donaldson Day 156-RFH-10 unit with gas flow rate of 4000 actual cubic feet per minute;
 - (2) One (1) Torit Day 276 RFW unit, with gas flow rate of 4000 actual cubic feet per minute; and
 - (3) One (1) canister type Murphy Rodgers – MRAL-14 unit, use in the sample shop area with gas flow rate of 4000 actual cubic feet per minute, and venting inside the building.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (1) natural gas-fired air makeup, heating units, furnaces and oven burners.
- (g) Other activities or categories below insignificant thresholds:
 - (1) three (3) plastic stripper tanks, identified as Nos. 27-29, using no control, and exhausting to stacks identified as Nos. 27-29. Dip tank No. 29 is no longer in service.
 - (2) one (1) dust collector with a maximum throughput capacity of 6,000 CFM. This is a small unit used only for the sample shop. [326 IAC 6.5-1-2]
 - (3) five (5) bulk storage tanks used to store plastic making polymers. The polymers have extremely low vapor pressure. No VOC or HAPs emissions are associated with these tanks.
 - (4) one hundred forty (140) cubic foot plastic dust bin; Closed bin; Off cyclone; Five thousand (5000) pound capacity.
 - (5) water-based mold release agents.
 - (6) non VOC, non HAPs fillers used in plastic production (pecan shell flour, glass beads, calcium, etc)
 - (7) hand held sanders and grinders. [326 IAC 6.5-1-2]

Existing Approvals

Since the issuance of the Part 70 Operating Permit T037-6952-00085 on March 28, 2002, the source has also constructed or has been operating under the following approvals:

- (a) First Significant Permit Modification No.: 037-16032-00085, issued on March 6, 2003;
- (b) Second Significant Permit Modification No.: 037-15478-00085, issued on April 15, 2003;
- (c) Third Significant Permit Modification No.: 037-18203-00085, issued on December 15, 2003;
- (d) First Minor Permit Modification No.: 037-20050-00085, issued on July 25, 2005; and
- (e) First Administrative Amendment: 037-22867-00085, issued on May 9, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Nos. 1, 5, 7 through 10, 13, 22, 24, 30 and 31	Spray Booth Nos. 1, 5, 7 through 10, 13, 22, 24, I&K and 30	25 (each)	2.5 (each)	13,000 (each)	75
Nos. 2, 3, 4, 6, 11, 12, 14 through 21, 23 and 25	Spray Booth Nos. 2, 3, 4, 6, 11, 12, 14 through 21, 23 and 25	25 (each)	3.0 (each)	18,000	75

Emission Calculations

See Appendix A: pages 1 and 2 of this document for detailed emission calculations.

County Attainment Status

The source is located in Dubois County

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Dubois County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x 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) Dubois 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) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) 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 emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	18.56
PM-10	18.56
SO ₂	0.00
VOC	299.67
CO	0.00
NO _x	0.00

HAPs	tons/year
Glycol Ethers	13.27
Toluene	8.31
Xylene	7.62
Dimethylphthalate	19.97
Other HAPs	2.5
Total	51.67

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM-10	3
SO ₂	Not Reported
VOC	53
CO	Not Reported
NO _x	Not Reported
HAP	Not Reported

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential to Emit (tons/year)						HAPs
	PM	PM10	SO ₂	VOC	CO	NO _x	
Spray Booths (SB1 - SB26, SB30 and I&K)	18.56	18.56	0.00	< 250	0.00	0.00	Single HAP < 10 Total HAPs < 25
Total Emissions	18.56	18.56	0.00	< 250	0.00	0.00	Single HAP < 10 Total HAPs < 25

- (a) This existing stationary source is not major for PSD because the emissions of VOC are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Nonattainment NSR because the emissions of the nonattainment pollutant, PM10, are less than one hundred (<100) tons per year.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (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) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Each Spray Booth (SB1 - SB26, SB30 and I&K) - VOC	None	Y	< 100	< 100	100	N	N
Each Spray Booth (SB1 - SB26, SB30 and I&K) - PM/PM10	Dry Filter/ Waterwash	Y	< 100	< 100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart JJ – Standards for Wood Furniture Manufacturing Operations, are not included in the permit for this source. Pursuant to 40 CFR Part 63.800(a) the affected source to which Subpart JJ applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components that is located at a plant site that is a Part 70 major source. On March 6, 2003, J.P., Inc. d/b/a Jasper Plastics Solutions was issued a modification, First Significant Permit Modification No. 037-16032-00085 for the addition of wood surface coating to their existing plastic parts surface coating booths. In Significant Permit Modification No. 037-16032-00085, J.P., Inc. d/b/a Jasper Plastics Solutions accepted single and combined HAP limits of less than 10 and 25 tons per year, respectively as follows:

The entire source (including wood and plastic coating and solvent) single and combined HAP potential to emit shall be limited to less than 10 and 25 tons per consecutive 12 month period, with compliance determined at the end of each month. This shall ensure that there are no applicable requirements under 40 CFR 43 (NESHAP, Subpart JJ) – Standards for Wood Furniture Manufacturing.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart WWWW – Standards for Reinforced Plastic Composites Production, are not included in the permit for this source because the source has agreed to limit emissions of individual HAPs and a combination of HAPs to less than 10 and 25 tons per year, respectively.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart PPPP – Standards for Plastic Parts and Products Surface Coating, are not included in the permit for this source because the source has agreed to limit emissions of individual HAPs and a combination of HAPs to less than 10 and 25 tons per year, respectively.

State Rule Applicability - Entire Source

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

This existing source, constructed after the August 7, 1977 rule applicability date, is not considered as a major source since it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and source emissions are limited below the major source threshold of 250 tons per year, as follows:

Pursuant to T037-6952-00085, issued on March 28, 2002, the total source-wide usage of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents shall be limited to less than 250 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the potential to emit of VOC from the source, including insignificant activities, to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Nonattainment NSR

Dubois County has been designated as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment regulated pollutant. Upon this designation, the source became a minor source because it has a potential to emit of PM₁₀ at less than the major applicability threshold of 100 tons per year. No modifications have occurred at this source since January 5, 2005. Therefore, assuming that PM₁₀ emissions represent PM_{2.5} emissions, the Nonattainment NSR requirements do not apply.

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

This source is not subject to this rule. This rule applies to major sources of hazardous air pollutants (HAP) that were constructed or reconstructed after July 27, 1997. All the facilities at this source were constructed before 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted annually if the potential to emit of VOC or PM₁₀ is greater than 250 tons per year, otherwise the emission statement shall be submitted triennially. For this source, the source wide emissions of VOC and PM₁₀ are less than 250 tons per year. In accordance with the compliance schedule in 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 Exemptions), 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 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

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

This source is not subject to 326 IAC 6-5 for fugitive particulate matter emissions. Pursuant to 326 IAC 6-5, for any new source which has not received all the necessary preconstruction approvals before December 13, 1985, a fugitive dust control plan must be submitted, reviewed and approved. All the particulate emissions at this source exhaust to stacks. Therefore, 326 IAC 6-5 does not apply.

326 IAC 8-6 (Organic Solvent Emissions Limitation)

Pursuant to 326 IAC 8-6-2, sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state, with potential emissions of 90.7 megagrams (100 tons) or greater per year of VOC, not limited by other rules in Article 8 shall not emit or cause the emission of more than 100 tons per year of VOC from any existing sources unless all VOC emitted from such source are reduced by at least 85% from emissions which would occur before the application of any control equipment or process.

The source was constructed after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 do not apply.

State Rule Applicability – Individual Facilities

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

The facilities at this source are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because the allowable emissions for 326 IAC 6-3-2 are less stringent than the allowable emissions for 326 IAC 6.5-1-2. Pursuant to 326 IAC 6-3-1(b) (1), these facilities are not subject to 326 IAC 6-3-2.

326 IAC 6.5-1-1 (Particulate Limitations - Dubois County)

This rule applies to specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit of 100 tons per year (tpy) or more actual emissions of 10 tpy or more of PM.

The source is located in the area of Dubois County specifically listed in 326 IAC 6.5-1(a)(2). The source and its facilities are not specifically listed at 326 IAC 6.5-1-9 and, therefore, the requirements of 326 IAC 6.5-1-9 do not apply. The potential to emit PM from the entire source is greater than one-hundred (100) tons per year. Therefore, the requirements of 326 IAC 6.5-1-2(a) (General Sources) are applicable to this source. Pursuant to this rule, particulate matter emissions from this source shall be limited as follows:

- (a) The particulate matter (PM) from the spray booths (SB1 - SB26, SB30 and I&K) shall be limited to 0.03 grains per dry standard cubic foot.

The water pans and/or dry filters shall be in operation at all times the spray booths are in operation, in order to comply with this limit.

- (b) The particulate matter (PM) from the grinding and machining operations shall be limited to 0.03 grains per dry standard cubic foot.

The two (2) dust collectors shall be in operation at all times the grinding and machining operations are operating, in order to comply with this limit.

- (c) The insignificant activities consisting of plastic and wood machining controlled by baghouses; one (1) dust collector with a maximum throughput capacity of 6,000 CFM; and hand held sanders shall each be limited to 0.03 grains per dry standard cubic foot.

326 IAC 8-2-10 (Flat Wood Panel Manufacturing Operations):

The requirements of 326 IAC 8-2-10 do not apply to the wood coating operation because the wood coated is wood furniture, not wood paneling as described in 326 IAC 8-2-10(a)(1), (2), and (3).

326 IAC 8-11 (Wood Furniture Coatings);

The requirements of 326 IAC 8-11 do not apply to the wood furniture coating operation because the source is not located in any of the applicable counties (Lake, Porter, Clark, and Floyd).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

(a) Pursuant to 326 IAC 8-2-1(a)(1 through 3) (Surface Coating Emission Limitations: Applicability), wood furniture and cabinet coating is not described in sections 2 through 8 or section 11 of this rule, and the source is located in Dubois county; therefore, spray booths (SB1 – SB16) are not subject to 326 IAC 8-2 under these portions of the rule. Pursuant to 326 IAC 8-2-1(a)(4), the spray booths (SB1 – SB16) were all installed prior to July 1, 1990; therefore these facilities are not subject to 326 IAC 8-2 under this portion of the rule. Consequently, 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) does not apply to any of the spray booths (SB1 – SB16).

(b) This source is subject to 326 IAC 8-2-12 for the spray booths (SB17 - SB26, SB30 and I&K), when coating wood furniture or wood furnishings, since they are facilities of the type described in 326 IAC 8-2-12 that were constructed after July 1, 1990 and each booth has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. Since J.P., Inc. d/b/a Jasper Plastics Solutions uses air assisted airless spray application, they will be able to comply with 326 IAC 8-2-12.

326 IAC 8-1-6 (Best Available Control Technology ((BACT))

This rule applies to facilities constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year. Spray booths (SB1 - SB26, SB30 and I&K) each have potential VOC emissions greater than 25 tons per year for coating molded plastic parts and are subject to 326 IAC 8-1-6. Pursuant to 326 IAC 8-1-6 and First Significant Permit Modification No. 037-16032-00085, issued on March 6, 2003, J.P., Inc. d/b/a Jasper Plastics Solutions shall, during all periods when coating molded plastic parts, apply all coating materials using airless spray application, air-assisted airless spray application, or high-volume low-pressure (HVLP) spray application. Compliance with these conditions shall satisfy the requirements of 326 IAC 8-1-6 (BACT).

The requirements of 326 IAC 8-1-6 do not apply to spray booths (SB17 - SB26, SB30 and I&K) when applying wood furniture coatings because 326 IAC 8-2-12 applies during these periods.

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

This rule is not applicable because the three (3) stripper tanks (Nos. 27-29) are using acetone only, which is not considered a volatile organic compound (VOC).

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

- (a) The compliance monitoring requirements applicable to the spray booths (SB17 - SB26, SB30 and I&K) are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Dry filters for spray booths (SB1, SB7 – SB10, SB13, SB26 and I&K)	Placement, integrity and particle loading of the filters.	Daily	Normal-Abnormal	Response Steps
	Overspray	Weekly		
	Coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground.	Monthly		
Waterwash for spray booths (SB2 - SB6, SB11, SB12, SB14 – SB25 and SB30)	Water level of the water pans meet the manufacturer's recommended level	Daily	Normal-Abnormal	Response Steps
	Water level of the pans shall be maintained at a level where surface agitation indicates impact of the air flow	Weekly		
	Baffle Panel Inspections	Weekly		
	Overspray	Weekly		

These monitoring conditions are necessary because the dry filters and the waterwash for the spray booths (SB17 - SB26, SB30 and I&K) must operate properly to ensure compliance with 326 IAC 6.5-1-2 (Particulate Limitations - Dubois County) and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on June 28, 2006.

Conclusion

The operation of this stationary source which manufactures molded plastic and wood parts shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T037-23290-00085.

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

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 1220 Power Drive, Jasper, IN 47546
Part 70 Renewal: T037-23290-00085
Reviewer: Alic Bent/ EVP

Spray Booths 1 through 26, 30 and I&K

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Sauder Mrt	7.65	92.30%	14.1%	78.20%	0.0%	35.90%	0.695	5.98	5.98	4.16	99.78	18.21	0.45	16.66	75%
Lacquer	7.68	76.00%	6.0%	70.00%	0.0%	36.00%	0.9595	5.38	5.38	5.16	123.80	22.59	1.94	14.93	75%
20 Sheen Precat	7.64	77.00%	6.0%	71.00%	0.0%	35.00%	0.6305	5.42	5.42	3.42	82.08	14.98	1.21	15.50	75%
Urethane Rim Coating	9.43	52.00%	0.0%	52.00%	0.0%	48.00%	0.1025	4.90	4.90	0.50	12.06	2.20	0.51	10.22	75%
Release Coating	6.58	90.00%	0.0%	90.00%	0.0%	10.00%	0.19	5.92	5.92	1.13	27.00	4.93	0.14	59.22	75%
Butyl Acetate	7.5	100.00%	0.0%	100.00%	0.0%	0.00%	0.33	7.50	7.50	2.48	59.40	10.84	0.00	N/A	100%
Sauder Back Brown	12.6	33.00%	0.0%	33.00%	0.0%	67.00%	0.0775	4.16	4.16	0.32	7.73	1.41	0.72	6.21	75%
Ethyl Acetate	7.53	100.00%	0.0%	100.00%	0.0%	0.00%	0.118	7.53	7.53	0.89	21.32	3.89	0.00	N/A	75%
MEK Peroxide	9.26	38.00%	0.0%	38.00%	0.0%	62.00%	0.302	3.52	3.52	1.06	25.50	4.65	1.90	5.68	75%
Basecoat	8.05	75.50%	2.0%	73.50%	0.0%	28.50%	0.0525	5.92	5.92	0.31	7.46	1.36	0.11	20.76	75%
Brushed Aluminum	8.33	70.80%	0.9%	69.90%	0.0%	31.00%	0.125	5.82	5.82	0.73	17.47	3.19	0.33	18.78	75%
Custom Black	7.25	90.00%	3.1%	86.90%	0.0%	16.20%	0.275	6.30	6.30	1.73	41.58	7.59	0.22	38.89	75%
2945U Blue	7.73	80.30%	1.5%	78.80%	0.0%	22.70%	0.2	6.09	6.09	1.22	29.24	5.34	0.33	26.83	75%
Masinite MRT	7.57	77.00%	0.0%	77.00%	0.0%	23.00%	0.0825	5.83	5.83	0.48	11.54	2.11	0.16	25.34	75%
Masonite	7.18	84.00%	0.0%	84.00%	0.0%	16.00%	0.14	6.03	6.03	0.84	20.26	3.70	0.18	37.70	75%
Cherry Basecoat	8.21	72.40%	1.0%	71.40%	0.0%	29.60%	0.0765	5.86	5.86	0.45	10.76	1.96	0.19	19.80	75%
Windsor Basecoat	8.09	75.00%	2.0%	73.00%	0.0%	29.00%	0.0825	5.91	5.91	0.49	11.69	2.13	0.18	20.36	75%
American Oak	8.32	69.90%	0.0%	69.90%	0.0%	30.10%	0.0575	5.82	5.82	0.33	8.03	1.46	0.16	19.32	75%
Frosty White	8.48	65.50%	0.0%	65.50%	0.0%	34.50%	0.4035	5.55	5.55	2.24	53.79	9.82	1.29	16.10	75%
White P63W2207	8.31	71.30%	1.0%	70.30%	0.0%	30.70%	0.8195	5.84	5.84	4.79	114.90	20.97	2.14	19.03	75%
Basecoat P63Y10	7.31	82.90%	0.0%	82.90%	0.0%	17.10%	0.0525	6.06	6.06	0.32	7.64	1.39	0.27	35.44	75%
Summit Ash Glaze	8.45	66.80%	0.0%	66.80%	0.0%	33.20%	0.084	5.64	5.64	0.47	11.38	2.08	0.26	17.00	75%
Fleetwood Glaze	7.89	62.74%	0.0%	62.74%	0.0%	37.26%	0.0865	4.95	4.95	0.43	10.28	1.88	0.28	13.29	75%
Brown Maple Glaze	7.77	60.23%	0.0%	60.23%	0.0%	39.77%	0.05	4.68	4.68	0.23	5.62	1.02	0.17	11.77	75%
Plantation Cherry Glaze	7.9	59.60%	0.0%	59.60%	0.0%	40.40%	0.065	4.71	4.71	0.31	7.35	1.34	0.23	11.65	75%
Fruitwood Glaze	8.51	45.00%	0.0%	45.00%	0.0%	55.00%	0.0525	3.83	3.83	0.20	4.83	0.88	0.27	6.96	75%
Jayco Oak	7.75	57.50%	0.0%	57.50%	0.0%	42.50%	0.0565	4.46	4.46	0.25	6.04	1.10	0.20	10.49	75%
Topcoat	7.35	75.00%	0.0%	75.00%	0.0%	25.00%	0.44	5.51	5.51	2.43	58.21	10.62	0.89	22.05	75%
Bright CAT Lacquer	7.67	76.35%	6.0%	70.35%	0.0%	35.65%	0.09	5.40	5.40	0.49	11.66	2.13	0.18	15.14	75%
Precat LAC	7.64	77.40%	6.0%	71.40%	0.0%	34.60%	0.275	5.45	5.45	1.50	36.00	6.57	0.52	15.77	75%
Precat Catalyst	8.75	50.00%	0.0%	50.00%	0.0%	50.00%	0.0465	4.38	4.38	0.20	4.88	0.89	0.22	8.75	75%
Mineral Spirits	6.35	100.00%	0.0%	100.00%	0.0%	0.00%	0.385	6.35	6.35	2.44	58.67	10.71	0.00	N/A	100%
140 Flash Naphtha	6.5	100.00%	0.0%	100.00%	0.0%	0.00%	0.1925	6.50	6.50	1.25	30.03	5.48	0.00	N/A	100%
MEK	6.68	100.00%	0.0%	100.00%	0.0%	0.00%	0.01	6.68	6.68	0.07	1.60	0.29	0.00	N/A	100%
Methyl Amyl Ketone	6.76	100.00%	0.0%	100.00%	0.0%	0.00%	0.05	6.76	6.76	0.34	8.11	1.48	0.00	N/A	100%
Reducer R7K305	6.84	100.00%	0.0%	100.00%	0.0%	0.00%	0.6225	6.84	6.84	4.26	102.19	18.65	0.00	N/A	100%
Mold Release Toner P63WC32	7.64	78.00%	14.0%	64.00%	0.0%	50.00%	0.3705	4.89	4.89	1.81	43.48	7.93	0.68	9.78	75%
Mold Release	7.61	87.70%	9.1%	78.60%	0.0%	30.50%	0.1865	5.98	5.98	1.12	26.77	4.89	0.19	19.61	75%
Mold Release Black	7.09	85.00%	0.0%	85.00%	0.0%	15.00%	0.265	6.03	6.03	1.60	38.33	6.99	0.31	40.18	75%
Mold Release Toner P63NC84	7.71	91.40%	0.0%	77.40%	0.0%	36.60%	2.678	5.97	5.97	15.98	383.55	70.00	1.94	16.30	75%
Total Uncontrolled Potential Emissions										68.42	1642.02	299.67	18.56		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr)*(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of worst case coatings in each booth

HAP Emission Calculations

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
 Plant Location: 1220 Power Drive, Jasper, IN 47546
 Permit No.: T037-23290-00085
 Permit Reviewer: Alic Bent/ EVP

Booth Number	Xylene Emission Rate (lb/hr)	Toluene Emission Rate (lb/hr)	Formaldehyde Emission Rate (lb/hr)	Ethyl Benzene Emission Rate (lb/hr)	Methanol Emission Rate (lb/hr)	MIBK Emission Rate (lb/hr)	Glycol Ethers Emission Rate (lb/hr)	Dimethyl-phthalate Emission Rate (lb/hr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methanol Emissions (ton/yr)	MIBK Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Dimethyl-phthalate Emissions (ton/yr)	Total (ton/yr)
Spray Booths 1 through 26, 30 and I&K	1.74	1.90	0.01	0.33	0.02	0.20	3.03	4.56	7.62	8.31	0.05	1.45	0.11	0.89	13.27	19.97	51.67

METHODOLOGY

HAPs emission rate (tons/yr) = HAPs emission rate (lbs/hr) * 8760 hrs/yr * 1 ton/2000 lbs