



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: December 20, 2006
RE: Continental Mirrored Graphics / 039-23420-00613
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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Indianapolis, Indiana 46204-2251
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NEW SOURCE CONSTRUCTION AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Continental Mirrored Graphics
1838 Middlebury Road
Elkhart, Indiana 46516**

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

| | |
|--|-----------------------------------|
| Operation Permit No.: 039-23420-00613 | |
| Issued by: Original signed by | Issuance Date:December 20, 2006 |
| Nisha Sizemore, Chief Permits Branch Office of Air Quality | Expiration Date:December 20, 2011 |

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary graphics arts operation.

| | |
|------------------------------|--|
| Authorized Individual: | President |
| Source Address: | 1838 Middlebury Road, Elkhart, Indiana 46516 |
| Mailing Address: | 1838 Middlebury Road, Elkhart, Indiana 46516 |
| General Source Phone Number: | 574-522-7983 |
| SIC Code: | 2759 and 3211 |
| County Location: | Elkhart |
| Source Location Status: | Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants |
| Source Status: | Minor Source Operating Permit Program Minor Source under PSD and Emission Offset Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) screen printed glass line, constructed in 2004, with a maximum throughput of 6.229 square feet of glass per hour, utilizing silk screening to transfer inks to mirror surface, exhausting to stacks D3 and D4.
- (b) One (1) natural gas-fired air make-up unit, identified as A1, with a maximum heat input of 0.15 MMBtu per hour, exhausting to stack A1.
- (c) Ten (10) natural gas-fired DTH tube heaters, with a maximum heat input of 0.15 MMBtu per hour each, exhausting to stacks B6 through B10.
- (d) Thirteen (13) natural gas-fired DBS tube heaters, with a maximum heat input of 0.075 MMBtu per hour each, exhausting to stacks B3 through B5.
- (e) Three (3) natural gas-fired hot water heaters, with a maximum heat input of 0.919 MMBtu per hour each, exhausting to stack B1.
- (f) One (1) natural gas-fired hot water heater, with a maximum heat input of 0.1999 MMBtu per hour, exhausting to stack B11.
- (g) Two (2) natural gas-fired print cure ovens, identified as D3 and D4, constructed in 2004, with a maximum heat input of 1.34 MMBtu per hour each, exhausting to stacks D3 and D4.
- (h) One (1) mirror production line, identified as D1, permitted to construct in 2006, with a maximum throughput of 3,886 square feet of glass per hour, utilizing flow-coating exhausting to stacks D1 and D2.

- (i) Two (2) natural gas-fired paint cure ovens, identified as D1 and D2, permitted to construct in 2006, with a maximum heat input of 1.34 MMBtu per hour each, exhausting to stacks D1 and D2.

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, 039-23420-00613, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
 - (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 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.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1)

B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3]

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to 039-23420-00613 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.15 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

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

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

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

B.17 Source Modification Requirement

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

B.18 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]

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

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

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

B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.20 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.21 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

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

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) screen printed glass line, constructed in 2004, with a maximum throughput of 6.229 square feet of glass per hour, utilizing silk screening to transfer inks to mirror surface, exhausting to stacks D3 and D4.
- (h) One (1) mirror production line, identified as D1, permitted to construct in 2006, with a maximum throughput of 3,886 square feet of glass per hour, utilizing flow-coating exhausting to stacks D1 and D2.
- (i) Two (2) natural gas-fired paint cure ovens, identified as D1 and D2, permitted to construct in 2006, with a maximum heat input of 1.34 MMBtu per hour each, exhausting to stacks D1 and D2.

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

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC content delivered to the mirror line, identified as D1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

Compliance Determination Requirements

D.1.2 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.3 VOC Emissions

Compliance with Condition D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to

coatings and those used as cleanup solvents.

- (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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 an "authorized individual" as defined by 326 IAC 2-1.1-1.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

| | |
|----------------------|-------------------------------|
| Company Name: | Continental Mirrored Graphics |
| Address: | 1838 Middlebury Road |
| City: | Elkhart, Indiana 46516 |
| Phone #: | 574-522-7983 |
| MSOP #: | 039-23420-00613 |

I hereby certify that Continental Mirrored Graphics is :

still in operation.

no longer in operation.

I hereby certify that Continental Mirrored Graphics is :

in compliance with the requirements of MSOP 039-23420-00613.

not in compliance with the requirements of MSOP 039-23420-00613.

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

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

| |
|-----------------------|
| Noncompliance: |
| |
| |
| |
| |

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality Compliance Data Section

Quarterly Report

Company Name: Continental Mirrored Graphics
Location: 1838 Middlebury Road, Elkhart, Indiana 46516
Permit No.: 039-23420-00613
Source: Mirror Line D1
Pollutant: VOC
Limit: 25 tons/12 consecutive month period with compliance determined at the end of each month

QUARTER :

YEAR:

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Continental Mirrored Graphics
1838 Middlebury Road
Elkhart, Indiana 46516

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)

knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Continental Mirrored Graphics, 1838 Middlebury Road, Elkhart, Indiana 46516, completed construction of the graphics arts operation on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on July 26, 2006, and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. CP039-23420-00613, Plant ID No. 039-00613 issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires:

Signature _____

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Addendum to Technical Support Document (TSD) for a New Source Construction and a Minor Source Operating Permit

Source Background and Description

| | |
|-----------------------|--|
| Source Name: | Continental Mirrored Graphics |
| Source Location: | 1838 Middlebury Road, Elkhart, Indiana 46516 |
| County: | Elkhart |
| SIC Code: | 2759 and 3211 |
| Operation Permit No.: | M039-23420-00613 |
| Permit Reviewer: | ERG/TDP |

On January 18, 2006, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Continental Mirrored Graphics had applied for a New Source Construction and Minor Source Operating Permit (MSOP) to operate a stationary graphics arts operation with control. The notice also stated that IDEM, OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 1, 2006, DECA Environmental and Associates, Inc. (DECA) submitted comments on the proposed MSOP permit. The summary of the comments and responses are shown below. Deleted text is shown in ~~strikeout~~ and new text is shown in **bold**. The Table of Contents has been updated as necessary.

Comment 1:

DECA feels that the maximum capacity of the mirror line is misrepresented, and should be 4,000 square feet per hour. The commentor was concerned that the rates stated in the permit were under estimated when the throughput in pounds is converted to square feet:

1,562 lbs. of 1/8" glass = 935 square feet/hour
2,451 lbs. of 3/16" glass = 1,008 square feet/hour
2,930 lbs. of 1/4" glass = 915 square feet /hour.

This is based on an industry standard measurement:

1/8" = 1.67 lb/sq ft
3/16" = 2.43 lb/sq ft
1/4" = 3.20 lb/sq ft

DECA felt this maximum rate should be confirmed and revised as necessary in the permit. DECA has requested the emission calculations be performed using the gal/unit throughput. DECA was concerned that the PTE was incorrectly calculated, and that the source may inadvertently violate a BACT limit in the future.

Response to Comment 1:

For the draft permit, the maximum capacity of the mirror line was based on the average throughput of the line. The correct maximum capacity of the line, based on additional information provided by the source, is 3,886 ft/min. The weight per square foot reference used as industrial standard by DECA varies from the data provided by Continental Mirrored Graphic's suppliers. This difference in the weight per square foot of glass for different thicknesses of glass results in different square foot/hour throughputs.

The calculations included in the Technical Support Document were based on the maximum material throughput rates of paint for the line. These calculations reflected actual usage scaled up to 8,760 hours per year. The paint usage is theoretically static across all thicknesses of glass to which it is applied. Maximum material usage rates are 1400 square feet per gallon for this operation. When calculating the mirror line PTE utilizing the maximum machine capacity (square feet per hour) and maximum paint usage (gallons per square foot), material usage is calculated at 2.78 gallons per hour. The paint originally identified in TSD Appendix A was the incorrect product. This paint is no longer used and has been discontinued. Continental Mirrored Graphics submitted an MSDS for their correct paint on December 13, 2006. The current paint has a density of 11.9 lbs/gallon, a VOC content of 2.9 lbs/ gallon, and a lead content of three percent (3%).

3,886 square feet/hour / 1400 square feet/gal = 2.78 gal material per hour
2.78 gal/hour x 2.9 lbs VOC/gal x 8,760 hours/year x 1 ton/2000 lbs = 35.3 tons VOC/year
2.78 gal/hour x 11.9 lbs/gallon x 3% lead content x 8,760 hours/year x 1 ton/2000lbs = 4.34 tons of lead per year

The total potential to emit from this source is 44.4 ton per year VOC and 6.9 ton per year lead. IDEM, OAQ had previously calculated the potential to emit of 53.6 tons VOC per year and 9.9 tons lead from the mirror production line. No changes in the applicability of State and Federal rules result from this revision to the PTE calculations. Regardless of the PTE calculation methods, the Permittee is required to keep records of usage insuring they can demonstrate compliance with the limit to make 326 IAC 8-1-6 not applicable. The permit has been modified as follows:

A.2 Emission Units and Pollution Control Equipment Summary

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

...

- (h) One (1) mirror production line, identified as D1, permitted to construct in 2006, with a maximum throughput of ~~1,562 lbs of 1/8" thick glass per hour, 2,451 lbs of 3/16" thick glass per hour, or 2,930 lbs of 1/4" thick~~ **3,886 square feet of glass per hour**, utilizing flow-coating exhausting to stacks D1 and D2.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) screen printed glass line, constructed in 2004, with a maximum throughput of 6.229 square feet of glass per hour, utilizing silk screening to transfer inks to mirror surface, exhausting to stacks D3 and D4.
- (h) **One (1) mirror production line, identified as D1, permitted to construct in 2006, with a maximum throughput of 3,886 square feet of glass per hour, utilizing flow-coating exhausting to stacks D1 and D2.**
- (i) **Two (2) natural gas-fired paint cure ovens, identified as D1 and D2, permitted to construct in 2006, with a maximum heat input of 1.34 MMBtu per hour each, exhausting to stacks D1 and D2.**

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

Comment 2:

DECA Environmental queried if the mirror line identified in A.2(h) should be included in Section D.1 of the permit.

Response to Comment 2:

IDEM, OAQ agrees that the mirror line should be included. The following changes have been made to the permit:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) screen printed glass line, constructed in 2004, with a maximum throughput of 6.229 square feet of glass per hour, utilizing silk screening to transfer inks to mirror surface, exhausting to stacks D3 and D4.
- (h) **One (1) mirror production line, identified as D1, permitted to construct in 2006, with a maximum throughput of 3,886 square feet of glass per hour, utilizing flow-coating exhausting to stacks D1 and D2.**
- (i) **Two (2) natural gas-fired paint cure ovens, identified as D1 and D2, permitted to construct in 2006, with a maximum heat input of 1.34 MMBtu per hour each, exhausting to stacks D1 and D2.**

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

Upon further review, IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified, if applicable, to reflect these changes.

1. The new construction, including the mirror line and the two (2) new natural gas fired paint cure ovens, identified as D1 and D2, have been included in Section D.1. Changes have been made to the permit as follows:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) screen printed glass line, constructed in 2004, with a maximum throughput of 6.229 square feet of glass per hour, utilizing silk screening to transfer inks to mirror surface, exhausting to stacks D3 and D4.
- (h) One (1) mirror production line, identified as D1, permitted to construct in 2006, with a maximum throughput of 3,886 square feet of glass per hour, utilizing flow-coating exhausting to stacks D1 and D2.
- (i) **Two (2) natural gas-fired paint cure ovens, identified as D1 and D2, permitted to construct in 2006, with a maximum heat input of 1.34 MMBtu per hour each, exhausting to stacks D1 and D2.**

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

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and a Minor Source Operating Permit

Source Background and Description

| | |
|-----------------------|--|
| Source Name: | Continental Mirrored Graphics |
| Source Location: | 1838 Middlebury Road, Elkhart, Indiana 46516 |
| County: | Elkhart |
| SIC Code: | 2759 and 3211 |
| Operation Permit No.: | M039-23420-00613 |
| Permit Reviewer: | ERG/TDP |

The Office of Air Quality (OAQ) has reviewed an application from Continental Mirrored Graphics relating to the operation of a stationary graphic arts operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) screen printed glass line, constructed in 2004, with a maximum throughput of 6.229 square feet of glass per hour, utilizing silk screening to transfer inks to mirror surface, exhausting to stacks D3 and D4.
- (b) One (1) natural gas-fired air make-up unit, identified as A1, with a maximum heat input of 0.15 MMBtu per hour, exhausting to stack A1.
- (c) Ten (10) natural gas-fired DTH tube heaters, with a maximum heat input of 0.15 MMBtu per hour each, exhausting to stacks B6 through B10.
- (d) Thirteen (13) natural gas-fired DBS tube heaters, with a maximum heat input of 0.075 MMBtu per hour each, exhausting to stacks B3 through B5.
- (e) Three (3) natural gas-fired hot water heaters, with a maximum heat input of 0.919 MMBtu per hour each, exhausting to stack B1.
- (f) One (1) natural gas-fired hot water heater, with a maximum heat input of 0.1999 MMBtu per hour, exhausting to stack B11.
- (g) Two (2) natural gas-fired print cure ovens, identified as D3 and D4, constructed in 2004, with a maximum heat input of 1.34 MMBtu per hour each, exhausting to stacks D3 and D4.

New Emission Units and Pollution Control Equipment

- (h) One (1) mirror production line, identified as D1, permitted to construct in 2006, with a maximum throughput of 1,562 lbs of 1/8" thick glass per hour, 2,451 lbs of 3/16" thick glass per hour, or 2,930 lbs of 1/4" thick glass per hour, utilizing flow-coating exhausting to stacks D1 and D2.
- (i) Two (2) natural gas-fired paint cure ovens, identified as D1 and D2, permitted to construct in 2006, with a maximum heat input of 1.34 MMBtu per hour each, exhausting to stacks D1 and D2.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under SSOA 039-20260-00613, issued on December 13, 2004.

No other approvals have been issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

| Stack ID | Operation | Height (ft) | Diameter Dimension | Flow Rate (acfm) | Temperature (°F) |
|----------|--------------------------------|-------------|--------------------|------------------|------------------|
| A1 | Air Exchange | 24' | 18" | 3803 | Ambient |
| B1 | (3) hot water heaters | 20' | 10" | 60-180 | 300 |
| B3-B5 | (13) DTS tube heaters | 20' | 6" | 60-180 | 300 |
| B6-B10 | (2) DTS Tube heaters per stack | 20' | 6" | 60-180 | 300 |
| B11 | (1) hot water heater | 20' | 10" | 60-180 | 300 |
| C1 | Vent | 10' | 2'x2' | 3803 | Ambient |
| C2 | Vent | 10' | 3'x3' | 3803 | Ambient |
| D1-D2 | Oven/Paint Cure | 26' | 16" | 3803 | 300 |
| D3-D4 | Oven/Print Cure | 21' | 12" | 5300 | 300 |

Recommendation

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

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

An application for the purposes of this review was received on July 26, 2006, with additional information received on August 19, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 3).

Potential to Emit of the Source Before Controls

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

| Pollutant | Potential to Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 0.09 |
| PM10 | 0.36 |
| SO ₂ | 0.03 |
| VOC | 66.8 |
| CO | 3.95 |
| NO _x | 4.71 |

| HAPs | Potential to Emit (tons/year) |
|---------------------|-------------------------------|
| Lead | 9.90 |
| Glycol Ethers | 9.09 |
| Methanol | 1.18 |
| Methyl Ethyl Ketone | 1.16 |
| Total | 23.3 |

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year and the potential to emit of VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

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

Note: On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Elkhart County has been classified as attainment or unclassifiable in Indiana for PM10, PM2.5, SO₂, NO₂, CO and Pb. 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.

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

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Emissions (tons/year) |
|------------------|-----------------------|
| PM | 0.09 |
| PM10 | 0.36 |
| SO ₂ | 0.03 |
| VOC | 66.8 |
| CO | 3.95 |
| NO _x | 4.71 |
| Pb | 9.90 |
| Single HAP | 9.90 |
| Combination HAPs | 23.3 |

- (a) This existing source is not a major stationary source under PSD because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is not a major stationary source under Emission Offset because VOC and NOx is emitted at a rate of less than 100 tons per year.
- (c) These emissions were based on the application submitted by the company, and the calculations provided in Appendix A.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 039-23420-00613, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source, constructed in 2004, is an existing minor source, because the potential to emit of all criteria pollutants is less than 250 tons per year, and the potential to emit lead is less than 25 tons per year. The potential to emit of the source following this modification, including the construction and operation of the new mirror line, remains less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-3 (Emission Offset)

This source is located in Elkhart County, which has been designated as nonattainment for the 8-hour ozone standard. The potential to emit of VOC and NOx are less than one hundred (100) tons per year. Therefore, 326 IAC 2-3 does not apply. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it has the potential to emit greater than five (5) tons per year of lead. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

326 IAC 5-1 (Opacity Limitations)

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

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

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

The operation of this stationary graphic arts operation will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

The source 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.

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

The source is not subject to the requirements of 326 IAC 6-5 because the potential fugitive particulate matter emissions are negligible.

State Rule Applicability – Mirror Line & Screen Print Line

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

The mirror line, to be constructed in 2006, is not subject to 326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes). The mirroring includes cleaning the float glass of any surface contamination using glass cleaners that does not generate particulate emissions. Silver and copper are then applied to the surface of the glass utilizing flow coating, in liquid form, with deionized water, from a traverse arm. The back of the mirror is then painted utilizing rollcoating. Therefore, there are no PM emissions from these surface coating operations.

The screen print line, constructed in 2004, is not subject to 326 IAC 6-3-1 because the process utilizes silk screening to transfer inks to mirror surface. There are no particulate emissions from this process.

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

The screen print line, constructed in 2004, is not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements) because the potential to emit VOC from this line is less than twenty-five (25) tons per year.

The mirror line, to be constructed in 2006, is subject to 326 IAC 8-1-6 because the potential to emit of VOC from this line is greater than twenty-five (25) tons per year. However, the source has accepted limits on VOC emissions from the mirror line to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not included in this permit.

326 IAC 8-2-5 (Paper Coating Operations)

This source is not subject to 326 IAC 8-2-5 (Paper Coating Operations) because this source does not coat paper, plastic, metal foil, or pressure sensitive tape/labels.

325 IAC 8-5-5 (Graphic Arts Operations)

This source is not subject to 325 IAC 8-5-5 (Graphic Arts Operations) because this source does not conduct packaging rotogravure printing, publication rotogravure printing, or flexographic printing operations

State Rule Applicability – Print Cure Ovens and Paint Cure Ovens

326 IAC 9-1-2 (Carbon Monoxide Emission Limits)

The paint cure and print cure ovens (identified as units D1 through D4) are not subject to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits) because these units are not refuse burning equipment.

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

The paint cure ovens, identified as D1 and D2, and print cure ovens, identified as D3 and D4, are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Sources of Indirect Heating) because the paint cure ovens and print cure ovens are not sources of indirect heating.

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

The paint cure ovens, identified as D1 and D2, and print cure ovens, identified as D3 and D4, are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because the potential to emit of particulate matter from each oven is less than five hundred fifty-one thousandths (0.551) pounds per hour.

Conclusion

The construction and operation of this stationary graphic arts operation shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 039-23420-00613.

Appendix A: Emissions Calculations
Emissions from the Print Line

Company Name: Continental Mirrored Graphics
Address: 1838 Middlebury Road, Elkhart, Indiana 46516
MSOP: 039-23420-00613
Reviewer: ERG/TDP
Date: September 8, 2006

PRINT LINE

| PRODUCT NAME | VOC | GLYCOL ETHER | XYLENE | METHANOL | TOLUENE | METHYL | METHYL | GLYCOL ETHER DB | DIETHYLENE GLYCOL | GLYCOL ETHER DM |
|---|--------|----------------|--------|----------|---------|--------------|-----------------|-----------------|-------------------|-----------------|
| | LB/GAL | COMPD WEIGHT % | | | | ETHYL KETONE | ISOBUTYL KETONE | | | |
| PURE LACQUER THINNER | 7.00 | 0 | 0 | 0.1 | 0.6 | 0.1 | 0.1 | 0 | 0 | 0 |
| SIMULATED ETCH | 4.69 | 0 | 0 | 0.01 | 0 | 0 | 0 | 0 | 0 | 0 |
| EPOXY CLEAR METALLIC BASE (ADHESION PROMOTER) | 4.47 | 0 | 0 | 0.58 | 0 | 0 | 0 | 0 | 0 | 0 |
| KRINKLE TEX PART A | 3.24 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| KRINKLE TEX PART B | 3.51 | 0 | 0 | 0 | 0 | 0 | 0 | 0.12 | 0 | 0 |
| LEADED EFFECT CLEAR | 0.64 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.01 | 0.03 |
| BUTYL CELLOSOLVE | 7.5 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MBI68 ink black | 3.59 | 0.34 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Metallic Base Et-6002 | 3.53 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MBI 29 Smooth Silver | 2.68 | 0.25 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CS Crystal Coast -CC-006 Part B | 3.66 | 0 | 0.05 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| OC-004 PART over | 4.04 | 0.32 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2 PART EPOXY BLACK ET-605B | 1.66 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

| PRODUCT NAME | MAXIMUM THROUGHPUT (GAL/HR) | DENSITY (LB/GAL) | MAXIMUM THROUGHPUT (LB/HR) | VOC (LB/YR) | GLYCOL ETHER COMPD (LB/YR) | XYLENE (LB/YR) | METHANOL (LB/YR) | TOLUENE (LB/YR) | METHYL ETHYL KETONE (LB/YR) | METHYL ISOBUTYL KETONE (LB/YR) | GLYCOL ETHER DB (LB/YR) | DIETHYLENE GLYCOL (LB/YR) | GLYCOL ETHER DM (LB/YR) |
|---|-----------------------------|------------------|----------------------------|--------------|----------------------------|----------------|------------------|-----------------|-----------------------------|--------------------------------|-------------------------|---------------------------|-------------------------|
| PURE LACQUER THINNER | 0.377 | 7.00 | 2.64 | 23118 | 0 | 0 | 2312 | 1203 | 2312 | 2312 | 0 | 0 | 0 |
| SIMULATED ETCH | 0.0585 | 9.00 | 0.53 | 2403 | 0 | 0 | 46.1 | 0 | 0 | 0 | 0 | 0 | 0 |
| EPOXY CLEAR METALLIC BASE (ADHESION PROMOTER) | 0.00025 | 7.76 | 0.002 | 10 | 0 | 0 | 9.86 | 0 | 0 | 0 | 0 | 0 | 0 |
| KRINKLE TEX PART A | 0.002 | 8.92 | 0.02 | 57 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| KRINKLE TEX PART B | 0.0025 | 8.62 | 0.02 | 77 | 0 | 0 | 0 | 0 | 0 | 0 | 22.7 | 0 | 0 |
| LEADED EFFECT CLEAR | 0.035 | 9.75 | 0.34 | 196 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 29.9 | 89.7 |
| BUTYL CELLOSOLVE | 0.224 | 7.5 | 1.68 | 14717 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MBI68 ink black | 0.001 | 8.92 | 0.01 | 31 | 26.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Metallic Base Et-6002 | 0.0045 | 9.09 | 0.04 | 139 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MBI 29 Smooth Silver | 0.0075 | 9.83 | 0.07 | 176 | 161 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CS Crystal Coast -CC-006 Part B | 0.122 | 8.9 | 1.09 | 3912 | 0 | 476 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| OC-004 PART over | 0.131 | 8.54 | 1.12 | 4636 | 3136 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2 PART EPOXY BLACK ET-605B | 0.0025 | 8.92 | 0.02 | 36 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PTE of VOC/HAP (lbs/yr): | 0.97 | 112.75 | 7.58 | 49506 | 18041 | 476 | 2368 | 1203 | 2312 | 2312 | 22.7 | 29.9 | 89.7 |
| PTE of VOC/HAP (tons/yr): | 0.00 | 0.06 | 0.00 | 24.8 | 9.02 | 0.24 | 1.18 | 0.60 | 1.16 | 1.16 | 0.01 | 0.01 | 0.04 |
| Total HAP (tons/yr): | 13.43 | | | | | | | | | | | | |

Methodology
PTE of VOC/HAP (lb/yr) = Maximum Throughput (gal/hr) x Density (lb/gal) x VOC/HAP Content (Weight %) x 8760 hrs/yr
PTE of VOC/HAP (ton/yr) = Maximum Throughput (gal/hr) x Density (lb/gal) x VOC/HAP Content (Weight %) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Emissions from the Mirror Line**

Company Name: Continental Mirrored Graphics
Address: 1838 Middlebury Road, Elkhart, Indiana 46516
MSOP: 039-23420-00613
Reviewer: ERG/TDP
Date: September 8, 2006

MIRROR LINE

| CHEMICAL NAME | VOC CONTENT (LB/GAL) | Lead Compounds Weight % |
|-------------------------------------|-------------------------|-------------------------------|
| PRODUCT NAME | | |
| Hilemn sureguard dark gray low lead | 3.7 | 0.05 |
| Ethylene Glycol | 7.51 | |
| Betashield 3500 Rollcoat | 0.00 | 0.04 |

| PRODUCT NAME | MAXIMUM THROUGHPUT (GAL/HR) | DENSITY (LB/GAL) | MAXIMUM THROUGHPUT (LB/HR) | PTE of VOC (LB/YR) | PTE of Lead Compounds (LB/YR) |
|-------------------------------------|-----------------------------------|---------------------|----------------------------------|-----------------------|-------------------------------------|
| Hilemn sureguard dark gray low lead | 2.75 | 12.11 | 33.3 | 89133 | 14586 |
| Ethylene Glycol | 0.275 | 7.51 | 2.07 | 18092 | 0 |
| Betashield 3500 Rollcoat | 1.10 | 13.51 | 14.86 | 0.00 | 5207 |
| PTE VOC/HAP (lbs/yr): | | | | 107225 | 19794 |
| PTE VOC/HAP (tons/yr): | | | | 53.6 | 9.90 |
| Total HAP (tons/yr): | 9.9 | | | | |

Methodology

PTE of VOC/Lead Compounds (lb/yr) = Maximum Throughput (gal/hr) x Density (lb/gal) x VOC/Lead Content (Weight %)

PTE of VOC/Lead Compounds (ton/yr) = Maximum Throughput (gal/hr) x Density (lb/gal) x VOC/Lead Content (Weight %) x 1 ton/2000 lbs

Appendix A: Emissions Calculations
Emissions from the Print Line

Company Name: Continental Mirrored Graphics
Address: 1838 Middlebury Road, Elkhart, Indiana 46516
MSOP: 039-23420-00613
Reviewer: ERG/TDP
Date: September 8, 2006

PRINT LINE

| PRODUCT NAME | VOC | GLYCOL | ETHER | XYLENE | METHANOL | TOLUENE | METHYL | METHYL | GLYCOL | DIETHYLENE | GLYCOL ETHER |
|---|--------|----------|----------|----------|----------|----------|--------|----------|----------|------------|--------------|
| | LB/GAL | ETHER | COMP | WEIGHT % | WEIGHT % | WEIGHT % | ETHYL | ISOBUTYL | ETHER DB | GLYCOL | DM |
| | | WEIGHT % | WEIGHT % | | | | KETONE | KETONE | WEIGHT % | WEIGHT % | WEIGHT % |
| PURE LACQUER THINNER | 7.00 | 0 | 0 | 0 | 0.1 | 0.6 | 0.1 | 0 | 0.1 | 0 | 0 |
| SIMULATED ETCH | 4.69 | 0 | 0 | 0 | 0.01 | 0 | 0 | 0 | 0 | 0 | 0 |
| EPOXY CLEAR METALLIC BASE (ADHESION PROMOTER) | 4.47 | 0 | 0 | 0 | 0.58 | 0 | 0 | 0 | 0 | 0 | 0 |
| KRINKLE TEX PART A | 3.24 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| KRINKLE TEX PART B | 3.51 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.12 | 0 | 0 |
| LEADED EFFECT CLEAR | 0.64 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.01 | 0.03 |
| BUTYL CELLOSOLVE | 7.5 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MBI68 ink black | 3.59 | 0.34 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Metallic Base Et-6002 | 3.53 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MBI 29 Smooth Silver | 2.68 | 0.25 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CS Crystal Coast -CC-006 Part B | 3.66 | 0 | 0.05 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| OC-004 PART over | 4.04 | 0.32 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2 PART EPOXY BLACK ET-605B | 1.66 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

| PRODUCT NAME | MAXIMUM | DENSITY | MAXIMUM | VOC (LB/YR) | GLYCOL | XYLENE | METHANOL | TOLUENE | METHYL ETHYL | METHYL | GLYCOL ETHER | DIETHYLENE | GLYCOL ETHER |
|---|--------------|---------------|-------------|--------------|--------------|-------------|-------------|-------------|--------------|-------------|--------------|-------------|--------------|
| | THROUGHPUT | (LB/GAL) | THROUGHPUT | | ETHER | (LB/YR) | (LB/YR) | (LB/YR) | KETONE | ISOBUTYL | DB | GLYCOL | DM |
| | (GAL/HR) | | (LB/HR) | | COMP | | | | (LB/YR) | KETONE | (LB/YR) | (LB/YR) | (LB/YR) |
| PURE LACQUER THINNER | 0.377 | 7.00 | 2.64 | 23118 | 0 | 0 | 2312 | 1203 | 0 | 2312 | 2312 | 0 | 0 |
| SIMULATED ETCH | 0.0585 | 9.00 | 0.53 | 2403 | 0 | 0 | 46.1 | 0 | 0 | 0 | 0 | 0 | 0 |
| EPOXY CLEAR METALLIC BASE (ADHESION PROMOTER) | 0.00025 | 7.76 | 0.002 | 10 | 0 | 0 | 9.86 | 0 | 0 | 0 | 0 | 0 | 0 |
| KRINKLE TEX PART A | 0.002 | 8.92 | 0.02 | 57 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| KRINKLE TEX PART B | 0.0025 | 8.62 | 0.02 | 77 | 0 | 0 | 0 | 0 | 0 | 0 | 22.7 | 0 | 0 |
| LEADED EFFECT CLEAR | 0.035 | 9.75 | 0.34 | 196 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 29.9 | 89.7 |
| BUTYL CELLOSOLVE | 0.224 | 7.5 | 1.68 | 14717 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MBI68 ink black | 0.001 | 8.92 | 0.01 | 31 | 26.6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Metallic Base Et-6002 | 0.0045 | 9.09 | 0.04 | 139 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MBI 29 Smooth Silver | 0.0075 | 9.83 | 0.07 | 176 | 161 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CS Crystal Coast -CC-006 Part B | 0.122 | 8.9 | 1.09 | 3912 | 0 | 476 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| OC-004 PART over | 0.131 | 8.54 | 1.12 | 4636 | 3136 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2 PART EPOXY BLACK ET-605B | 0.0025 | 8.92 | 0.02 | 36 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PTE of VOC/HAP (lbs/yr): | 0.97 | 112.75 | 7.58 | 49506 | 18041 | 476 | 2368 | 1203 | 2312 | 2312 | 22.7 | 29.9 | 89.7 |
| PTE of VOC/HAP (tons/yr): | 0.00 | 0.06 | 0.00 | 24.8 | 9.02 | 0.24 | 1.18 | 0.60 | 1.16 | 1.16 | 0.01 | 0.01 | 0.04 |
| Total HAP (tons/yr): | 13.43 | | | | | | | | | | | | |

Methodology
PTE of VOC/HAP (lb/yr) = Maximum Throughput (gal/hr) x Density (lb/gal) x VOC/HAP Content (Weight %) x 8760 hrs/yr
PTE of VOC/HAP (ton/yr) = Maximum Throughput (gal/hr) x Density (lb/gal) x VOC/HAP Content (Weight %) x 1 ton/2000 lbs