INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 30, 2008

RE: Signature Skylights dba LinEl Signature / 109-23612-00021

FROM: Matthew Stuckey, 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 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, Suite N 501E, 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.dot12/03/07

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Signature Skylights, LLC d/b/a LinEl Signature
101 Linel Drive
Mooresville, Indiana 46158

(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. 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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F109-23612-00021	
Issued by: Original signed by: Chrystal Wagner for Matthew Stuckey, Chief Permits Branch Office of Air Quality	Issuance Date: April 30, 2008 Expiration Date: April 30, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary architectural metal work plant manufacturing aluminum skylights, handrails, and other architectural metal parts.

Source Address:	101 Linel Drive, Mooresville, Indiana 46158
Mailing Address:	101 Linel Drive, Mooresville, Indiana 46158
General Source Phone Number:	(317) 831-5314
SIC Code:	3446
County Location:	Morgan
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Nonattainment NSR Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

Four (4) spray paint booths (identified as PB-1, PB-2, PB-3, and PB-4), constructed in 2002, equipped with electrostatic air atomization spray guns and used to paint aluminum skylights, handrails, and architectural metal. Each paint booth has a maximum throughput capacity of 2,880 square feet of aluminum per hour. Emissions of particulate matter are controlled using dry filters, while emissions of VOC and HAP are controlled using a regenerative thermal oxidizer.

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

This stationary source also includes the following insignificant activities:

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

(1) One (1) natural gas-fired curing oven with a maximum heat input capacity of 5.175 MMBtu per hour, exhausting at stack No. 3, with VOC and HAP emissions controlled using a regenerative thermal oxidizer.

(2) One (1) natural gas-fired oven used solely for removing water from aluminum parts after washing with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting at stack D1.

(3) One (1) natural gas-fired burn off oven with a maximum heat input capacity of 0.78 MMBtu per hour, exhausting at stack No. 4. [326 IAC 4-2]

(4) Three (3) natural gas-fired liquid tank heaters, each with a maximum heat input capacity of 1.5 MMBtu per hour, exhausting at stacks No. 5, No. 6, and No. 7.

(b) Machining where an aqueous cutting coolant continuously floods the machining interface.

(c) Degreasing operations that do not exceed 145 gallons per 12 months and not subject to 325 IAC 20-6. These are hand-wipe degreasing operations only.

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]

(e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(f) Operations using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(g) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(h) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(i) Activities with uncontrolled emissions equal to or less than the exemption thresholds provided in 326 IAC 2-1.1-3(d)(1), including:

(1) One (1) etch cleaner tank;

(2) One (1) etch and strip tank;

(3) One (1) chrome phosphate tank;

(4) Grinding operations; [326 IAC 6-3-2] and

(5) One (1) pour and debridge line.

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F109-23612-00021, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by 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.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 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.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that 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 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

(a) All terms and conditions of permits established prior to F109-23612-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by 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
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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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 Stack Height [326 IAC 1-7]

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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 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.

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred 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 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 EMISSIONS UNIT OPERATION CONDITIONS

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

(a) Four (4) spray paint booths (identified as PB-1, PB-2, PB-3, and PB-4), constructed in 2002, equipped with electrostatic air atomization spray guns and used to paint aluminum skylights, handrails, and architectural metal. Each paint booth has a maximum throughput capacity of 2,880 square feet of aluminum per hour. Emissions of particulate matter are controlled using dry filters, while emissions of VOC and HAP are controlled using a regenerative thermal oxidizer.

Insignificant Activities:

(a) Natural gas-fired curing ovens, including:

(1) One (1) natural gas-fired curing oven with a maximum heat input capacity of 5.175 MMBtu per hour, exhausting at stack No. 3, with VOC and HAP emissions controlled using a regenerative thermal oxidizer.

(2) One (1) natural gas-fired oven used solely for removing water from aluminum parts after washing with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting at stack D1.

(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 2-8-4(1)]

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

(a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the four (4) spray paint booths PB-1, PB-2, PB-3, and PB-4 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D = Density of VOC in coating in pounds per gallon of VOC;
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(c) The pounds of VOC per gallon of coating solids shall be limited to less than 6.67 pounds of VOC per gallon of coating.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 95%.

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

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the four (4) spray paint booths PB-1, PB-2, PB-3, and PB-4 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Volatile Organic Compound (VOC) [326 IAC 2-8][326 IAC 2-2]

(a) The VOC emissions from the paint booths PB-1, PB-2, PB-3 and PB-4 shall be controlled using the regenerative thermal oxidizer with a minimum overall control efficiency of 95%.

(b) The total input of VOC to spray paint booths PB-1, PB-2, PB-3 and PB-4 shall not exceed 1,991.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above usage limit in addition to operating the thermal oxidizer with a minimum overall control efficiency of 95% at all times that the four (4) spray paint booths (PB-1 through PB-4) are in operation combined with the potential to emit of VOC from the insignificant activities will limit emissions of VOC from the entire source to less than 100 tons per twelve (12) consecutive month period and will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8][326 IAC 2-4.1-1]

(a) The HAP emissions from the paint booths PB-1, PB-2, PB-3 and PB-4 shall be controlled using the regenerative thermal oxidizer with a minimum overall control efficiency of 95%.

(b) The input of any single HAP to the spray paint booths shall not exceed 198 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The input of any combination of HAPs to the spray paint booths shall not exceed 495.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above usage limits in addition to operating the thermal oxidizer with a minimum overall control efficiency of 95% at all times that the four (4) spray paint booths (PB-1 through PB-4) are in operation combined with the potential to emit of HAP from the insignificant activities will limit emissions of any single HAP from the entire source to less than ten (10) tons per twelve (12) consecutive month period and will limit the emissions of any combination of HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period and will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.
.

D.1.5 Particulate Matter (PM) and Particulate Matter Less than or Equal to 10 microns (PM10) [326 IAC 2-8][326 IAC 2-2]

(a) The coatings applied by paint booths PB-1, PB-2, PB-3 and PB-4 shall be limited such that the total PM emissions shall not exceed 99.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The coatings applied by paint booths PB-1, PB-2, PB-3 and PB-4 shall be limited such that the total PM10 emissions shall not exceed 99.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The overall control efficiency for particulate matter in the paint booths PB-1, PB-2, PB-3 and PB-4, taking into account the transfer efficiency and dry filter control efficiency, shall not be less than 91.67%.

Compliance with these limits will limit emissions of PM and PM10 each to less than 100 tons per year and will make the provisions of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable to this source.

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the four (4) spray paint booths (PB-1, PB-2, PB-3, and PB-4) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-1.1-11]

(a) No later than 180 days after issuance of F109-23612-00021, in order to demonstrate compliance with condition D.1.5, the Permittee shall conduct overall particulate matter control efficiency testing on one (1) of the paint booths identified as PB-1, PB-2, PB-3 or PB-4. The testing shall be done on a booth that has not been tested for overall control efficiency in the past ten (10) years. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

(b) No later than 180 days after issuance of F109-23612-00021, in order to demonstrate compliance with conditions D.1.1(d), D.1.3(a), and D.1.4(a), the Permittee shall conduct a performance test to verify the VOC and HAP overall control efficiency for the thermal oxidizer used to control VOC and HAP emissions from the paint booths PB-1, PB-2, PB-3 and PB-4, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC) and HAP [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitation contained in Conditions D.1.1 and D.1.3 and the HAP content and usage limitation in Condition 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.

D.1.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 2-8]

(a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with condition D.1.1.

(b) In order to comply with conditions D.1.3 and D.1.4, the Permittee shall operate the thermal oxidizer at all times that paint booths PB-1, PB-2, PB-3 and PB-4 are in operation.

D.1.11 Particulate Matter (PM/PM10) Emissions Determination [326 IAC 2-2]

Compliance with Conditions D.1.5(a) and D.1.5(b) shall be determined by calculating the PM/PM10 emissions associated with each coating applied by paint booths PB-1, PB-2, PB-3 and PB-4 using the following equation:

$$PM/PM10 = \sum(CU \times D \times W\%S) \times (1-(OCE/100)) \times 1/2000$$

Where:

PM/PM10 = The total PM/PM10 emissions (ton/month) for all coatings.

CU = The total coating use (gal coating/month) of each coating.

D = The density (lb coating/gal coating) of each coating.

W%S = The weight percent solids (lb solids/lb coating) of each coating.

OCE = The overall particulate matter control efficiency of the spray booths. This value shall equal 91.67% unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

The total PM/PM10 emissions (ton/month) from paint booths PB-1, PB-2, PB-3 and PB-4 is equal to the sum of the PM/PM10 emissions associated with each coating applied by those booths.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.12 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below 1540°F. An hourly average temperature that is below 1540°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1, D.1.3, and D.1.4 as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.13 Parametric Monitoring

(a) The Permittee shall determine fan amperage from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1, D.1.3, and D.1.4, as approved by IDEM.

(b) The fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan amperage is outside the normal range of 70 to 74 Amps or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.14 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 surface coating booth 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) 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 2-8-4(3)]

D.1.15 Record Keeping Requirements

(a) To document compliance with conditions D.1.1, D.1.3, D.1.4, D.1.12, and D.1.13, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP content and usage limits established in conditions D.1.1, D.1.3, and D.1.4.

(1) The VOC and HAP content of each coating material and solvent used less water.

(2) The amount of coating material and solvent 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;

(3) The monthly cleanup solvent usage; and

(4) The total VOC and HAP usage for each month.

(5) The continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the fan amperage.

(b) To document compliance with Condition D.1.5, 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 demonstrate compliance with the PM/PM10 emission limits established in Condition D.1.5.

(1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The density and weight percent solids of each coating material used (as applied).

(3) The overall particulate matter control efficiency (OCE) of the spray booths PB-1, PB-2, PB-3 and PB-4.

(c) To document compliance with Condition D.1.14, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.

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

D.1.16 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.1.3 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A quarterly summary of the monthly PM/PM10 emissions from the booths covered by Condition D.1.5 calculated in accordance with Condition D.1.11 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(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) One (1) natural gas-fired burn off oven with a maximum heat input capacity of 0.78 MMBtu per hour, exhausting at stack No. 4. [326 IAC 4-2]

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]

(c) Activities with uncontrolled emissions equal to or less than the exemption thresholds provided in 326 IAC 2-1.1-3(d)(1), including:

(1) Grinding operations.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

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

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(b) Activities with uncontrolled emissions equal to or less than the exemption thresholds provided in 326 IAC 2-1.1-3(d)(1), including:

(1) Grinding operations.

D.2.2 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the following shall apply to the burn-off oven:

(a) All incinerators shall comply with the following requirements:

(1) Consist of primary and secondary chambers or the equivalent.

(2) Be equipped with a primary burner unless burning only wood products.

(3) Comply with 326 IAC 5-1 and 326 IAC 2.

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c) of the rule (included as paragraph (b) below).

(5) Not emit particulate matter in excess of one (1) of the following:

(A) Three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.

(B) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

(6) If any of the requirements of subdivisions (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(b) An owner or operator developing an operation and maintenance plan pursuant to subsection (a)(4) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (a)(5) and include the following:

(A) Procedures for receiving, handling, and charging waste.

(B) Procedures for incinerator startup and shutdown.

(C) Procedures for responding to a malfunction.

(D) Procedures for maintaining proper combustion air supply levels.

(E) Procedures for operating the incinerator and associated air pollution control systems.

(F) Procedures for handling ash.

(G) A list of wastes that can be burned in the incinerator.

(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(3) The operation and maintenance plan must be readily accessible to incinerator operators.

(4) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(c) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

D.2.3 Carbon Monoxide (CO) [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2(a)(3), the source shall not operate a refuse incinerator or refuse burning equipment unless the waste gas stream is burned in one (1) of the following:

(A) Direct-flame afterburner.

(B) Secondary chamber.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Signature Skylights, LLC d/b/a LinEl Signature
Source Address: 101 Linel Drive, Mooresville, Indiana 46158
Mailing Address: 101 Linel Drive, Mooresville, Indiana 46158
FESOP Permit No.: F109-23612-00021

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:
Printed Name:
Title/Position:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: Signature Skylights, LLC d/b/a LinEI Signature
Source Address: 101 Linel Drive, Mooresville, Indiana 46158
Mailing Address: 101 Linel Drive, Mooresville, Indiana 46158
FESOP Permit No.: F109-23612-00021

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- 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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Signature Skylights, LLC d/b/a LinEI Signature
Source Address: 101 Linel Drive, Mooresville, Indiana 46158
Mailing Address: 101 Linel Drive, Mooresville, Indiana 46158
FESOP Permit No.: F109-23612-00021
Facility: Paint booths PB-1, PB-2, PB-3, and PB-4
Parameter: VOC Input
Limit: The total input of VOC to spray paint booths PB-1, PB-2, PB-3 and PB-4 shall not exceed 1,991.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	12 Month Total VOC Input (tons)
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Signature Skylights, LLC d/b/a LinEI Signature
Source Address: 101 Linel Drive, Mooresville, Indiana 46158
Mailing Address: 101 Linel Drive, Mooresville, Indiana 46158
FESOP Permit No.: F109-23612-00021
Facility: Paint booths PB-1, PB-2, PB-3, and PB-4
Parameter: HAP Input
Limit:
(a) The input of any single HAP to the spray paint booths shall not exceed 198 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
(b) The input of any combination of HAPs to the spray paint booths shall not exceed 495.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

Month	Column 1		Column 2		Column 1 + Column 2	
	Single HAP Input This Month (tons)	Combined HAP Input This Month (tons)	Single HAP Input Previous 11 Months (tons)	Combined HAP Input Previous 11 Months (tons)	12 Month Total Single HAP Input (tons)	12 Month Total Combined HAP Input (tons)
Month 1						
Month 2						
Month 3						

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Signature Skylights, LLC d/b/a LinEI Signature
Source Address: 101 Linel Drive, Mooresville, Indiana 46158
Mailing Address: 101 Linel Drive, Mooresville, Indiana 46158
FESOP Permit No.: F109-23612-00021
Facility: Paint booths PB-1, PB-2, PB-3, and PB-4
Parameter: PM/PM10 Emissions
Limit:
(a) The coatings applied by paint booths PB-1, PB-2, PB-3 and PB-4 shall be limited such that the total PM emissions shall not exceed 99.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
(b) The coatings applied by paint booths PB-1, PB-2, PB-3 and PB-4 shall be limited such that the total PM10 emissions shall not exceed 99.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits shall be determined using the equation in condition D.1.11 to calculate PM/PM10 emissions.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	PM/PM10 Emissions This Month (tons)	PM/PM10 Emissions Previous 11 Months (tons)	12 Month Total PM/PM10 Emissions (tons)
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Signature Skylights, LLC d/b/a LinEI Signature
Source Address: 101 Linel Drive, Mooresville, Indiana 46158
Mailing Address: 101 Linel Drive, Mooresville, IN 46158
FESOP Permit No.: F109-23612-00021

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

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".
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ 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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	**Signature Skylights, LLC d/b/a LinEl Signature**
Source Location:	**101 Linel Drive, Mooresville, Indiana 46158**
County:	**Morgan**
SIC Code:	**3446**
Permit Renewal No.:	**F109-23612-00021**
Permit Reviewer:	**ERG/TE**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Signature Skylights, LLC d/b/a LinEl Signature (LinEl Signature) relating to the operation of an architectural metal work plant manufacturing aluminum skylights, handrails, and other architectural metal parts.

History

On September 5, 2006, LinEl Signature submitted applications to the OAQ requesting to renew its operating permit. LinEl Signature was issued a FESOP Renewal on June 12, 2002.

Permitted Emission Units and Pollution Control Equipment

Four (4) spray paint booths (identified as PB-1, PB-2, PB-3, and PB-4), constructed in 2002, equipped with electrostatic air atomization spray guns and used to paint aluminum skylights, handrails, and architectural metal. Each paint booth has a maximum throughput capacity of 2,880 square feet of aluminum per hour. Emissions of particulate matter are controlled using dry filters, while emissions of VOC and HAP are controlled using a regenerative thermal oxidizer.

Emission Units and Pollution Control Equipment Removed From the Source

Three (3) spray paint booths (identified as A, B, and C), constructed in 1987 and used for coating aluminum parts. The coatings are applied using air atomization spray guns. Paint booths A and B have a maximum capacity of 253.1 square feet per hour. Paint booth C has a maximum capacity of 56.25 square feet per hour. Paint booth A exhausts at stack A; paint booth B exhausts at stack B; and paint booth C exhausts at stack C. Emissions of particulate matter are controlled using dry filters.

Insignificant Activities

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

(1) One (1) natural gas-fired curing oven with a maximum heat input capacity of 5.175 MMBtu per hour, exhausting at stack No. 3, with VOC and HAP emissions controlled using a regenerative thermal oxidizer.

(2) One (1) natural gas-fired oven used solely for removing water from aluminum parts after washing with a maximum heat input capacity of 2.5 MMBtu per hour, exhausting at stack D1.

(3) One (1) natural gas-fired burn off oven with a maximum heat input capacity of 0.78 MMBtu per hour, exhausting at stack No. 4. [326 IAC 4-2]

(4) Three (3) natural gas-fired liquid tank heaters, each with a maximum heat input capacity of 1.5 MMBtu per hour, exhausting at stacks No. 5, No. 6, and No. 7.

(b) Machining where an aqueous cutting coolant continuously floods the machining interface.

(c) Degreasing operations that do not exceed 145 gallons per 12 months and not subject to 325 IAC 20-6. These are hand-wipe degreasing operations only.

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]

(e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(f) Operations using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(g) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(h) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(i) Activities with uncontrolled emissions equal to or less than the exemption thresholds provided in 326 IAC 2-1.1-3(d)(1), including:

(1) One (1) etch cleaner tank;

(2) One (1) etch and strip tank;

(3) One (1) chrome phosphate tank;

(4) Grinding operations; [326 IAC 6-3-2] and

(5) One (1) pour and debridge line.

Existing Approvals

Since the issuance of the FESOP Renewal F109-14253-00021 on June 12, 2002, the source has not received any additional approvals.

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.

The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

(a) Conditions D.1.7 and D.1.8 of FESOP Renewal F109-14253-00021, issued on June 12, 2002

D.1.7 Hazardous Air Pollutants (HAPs) [326 IAC 2-8] [326 IAC 2-8] [326 IAC 2-4.1-1]

(a) Prior to the installation of the new paint booths (PB-1, PB-2, PB-3, and PB-4) and control equipment required in Condition D.1.6, the Permittee shall limit the total amount of hazardous air pollutants used in the spray painting booths A, B, and C to less than ten (10) tons per twelve (12) consecutive month period for any single HAP and less than twenty-five (25) tons per twelve (12) consecutive month period for any combination of HAPs.

(b) After the installation of the new paint booths and control equipment required in Condition D.1.6, the existing paint booths A, B, and C shall be decommissioned and the emissions from the new paint booths PB-1, PB-2, PB-3, and PB-4 shall be controlled using the regenerative thermal oxidizer. The amount of hazardous air pollutants (HAPs) used in the painting booths PB-1, PB-2, PB-3, and PB-4 shall be limited as follows:

(1) The amount of any single HAP used in the spray paint booths shall be limited to two hundred (200) tons per twelve (12) consecutive month period. This is equivalent to emissions of any single HAP from the entire source to less than 10 tons per twelve (12) consecutive month period.

(2) The amount of any combination of HAPs used in the spray paint booths shall be limited to five hundred (500) tons per twelve (12) consecutive month period. This is equivalent to emissions of any combination of HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these limits makes the provisions of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to this source.

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 2-8]

(a) Prior to the installation of the new paint booths (PB-1, PB-2, PB-3 and PB-4) and the control equipment required in Condition D.1.6, the Permittee shall limit the amount of VOC used in the spray paint booths A, B and C to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) After the installation of the new paint booths and control equipment required in Condition D.1.6, the existing paint booths (A, B, and C) shall be decommissioned and the VOC emissions from the new paint booths shall be controlled using the regenerative thermal oxidizer. The total amount of VOC used in the spray paint booths PB-1, PB-2, PB-3, and PB-4 shall be limited to 1,980 tons per twelve (12) consecutive month period. Compliance with this condition will limit VOC emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and makes the provisions of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Reason revised: The source has installed paint booths PB-1, PB-2, PB-3, and PB-4 and removed paint booths A, B and C. Therefore, the limits for paint booths A, B, and C no longer apply and will be removed from these conditions.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP Renewal:

(a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

(b) Condition D.1.6 of FESOP Renewal F109-14253-00021, issued on June 12, 2002

D.1.6 Compliance Schedule for Achieving Compliance with 326 IAC 8-2-9

Pursuant to the consent decree of June 19, 2001, the Permittee shall comply with the following compliance schedule:

(a) On or before March 1, 2002, the Permittee shall submit documentation which confirms that the company has secured the funds necessary to finance the purchase and installation of the control equipment described in Condition D.1.6(d).

(b) On or before March 1, 2002, the Permittee shall submit documentation confirming that the control equipment has been ordered and indicating the anticipated dates of delivery and installation.

(c) If the Permittee fails to secure funds, order the control equipment, and submit documentation in compliance with Conditions D.1.6(a) and (b) March 1, 2002, then the Permittee shall cease operation of the spray paint booths until such time as the control equipment is installed.

(d) On or before June 28, 2002, the Permittee shall install and commence operation of a rotary concentrator and thermal oxidizer to control emissions from the spray paint booths or cease operation of these paint booths until such time as the controls are installed and operational.

(e) On or before August 27, 2002, the Permittee shall conduct compliance tests to confirm that the capture and destruction efficiency of the control equipment complies with the limits in Condition D.1.5.

Reason not incorporated: The source has installed and commenced operation of a rotary concentrator and thermal oxidizer to control VOC emissions from the spray booths prior to June 28, 2002 and conducted compliance tests on the thermal oxidizer on August 22, 2002 in compliance with condition D.1.6, therefore, the condition is no longer required.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Morgan County

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective October 19, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
$PM_{2.5}$	Basic nonattainment.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

(a) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Morgan County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability – Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone.

On November 8, 2007, a temporary emergency rule took effect redesignating Morgan County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.

(c) Morgan County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 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 or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	418
PM-10	418
SO_2	0.03
VOC	1,952
CO	4.77
NO_x	5.67

HAPs	Tons/year
Xylene	316
Toluene	199
Glycol Ethers	215
Ethylbenzene	66
Chromium Cmpds.	15
Dimethyl Phthalate	250
MIBK	201
Total	1,263

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC are equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit its PM-10 and VOC emissions to less than Title V levels. Therefore, the source will be issued a FESOP.

(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. However, the source has agreed to limit its single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.

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

No previous emission data has been received from the source.

Potential to Emit After Issuance

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

	Potential To Emit (tons/year)							
Process/emission unit	**PM**	**PM-10**	**SO_2**	**VOC**	**CO**	**NO_x**	**Single HAP**	**Total HAPs**
Paint Booths PB-1, PB-2, PB-3, and PB-4	99.47	99.47	0.00	99.59	0.00	0.00	9.9	24.79
Insignificant activities	0.11	0.43	0.03	0.31	4.77	5.67	0.10	0.11
Total Emissions	99.58	99.90	0.03	99.90	4.77	5.67	9.9	24.90

Federal Rule Applicability

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

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

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, Subpart T are not included in the permit for the degreasing operations because LinEI Signature does not use halogenated solvents in its degreasing operations.

State Rule Applicability - Entire Source

326 IAC 2-1.1-5 (Nonattainment NSR)

Morgan County was designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. On March 7, 2005, the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the Nonattainment New Source Review requirements. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tons per year of any nonattainment pollutant. LinEI Signature has a limited potential to emit of PM10 below 100 tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, Nonattainment NSR does not apply.

326 IAC 2-2 (PSD)

This source, constructed in 1987 after the August, 1977 applicability date, is not subject to the requirements of this rule. As shown in the Potential to Emit After Issuance table, the allowable emissions of all attainment regulated pollutants are less than 100 tons per year after application of all federally enforceable emission limits (see 326 IAC 2-8-4 (FESOP) discussion below). The PM10 and VOC limits discussed below under 326 IAC 2-8 limit PM10 and VOC emissions to render 326 IAC 2-2 (PSD) not applicable. PM emissions are also limited to less than 100 tons per year as follows:

(a) The coatings applied by paint booths PB-1, PB-2, PB-3 and PB-4 shall be limited such that total PM emissions shall not exceed 99.47 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The overall control efficiency for particulate matter in the paint booths PB-1, PB-2, PB-3 and PB-4, taking into account the transfer efficiency and dry filter control efficiency, shall not be less than 91.67%.

Therefore the requirements of 326 IAC 2-2 (PSD) do not apply.

Compliance with the above limit shall be determined by calculating the PM emissions associated with each coating applied by paint booths PB-1, PB-2, PB-3 and PB-4 using the following equation:

$$PM/PM10 = \sum(CU \times D \times W\%S) \times (1-(OCE/100)) \times 1/2000$$

Where:

PM = The total PM emissions (ton/month) for all coatings.

CU = The total coating use (gal coating/month) of each coating.

D = The density (lb coating/gal coating) of each coating.

W%S = The weight percent solids (lb solids/lb coating) of each coating.

OCE = The overall particulate matter control efficiency of the spray booths. This value shall equal 91.67% unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

The total PM emissions (ton/month) from paint booths PB-1, PB-2, PB-3 and PB-4 are equal to the sum of the PM emissions associated with each coating applied by those booths.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8 (FESOP)

The unrestricted potential emissions of any single HAP is greater than 10 tons per year and the unrestricted potential emissions of any combination of HAPs is greater than 25 tons per year. The source has accepted the following HAP usage limits which limit single and total HAP emissions from the entire source to less than the 10 and 25 tons per year, respectively:

(a) The HAP emissions from the paint booths PB-1, PB-2, PB-3 and PB-4 shall be controlled using the regenerative thermal oxidizer with a minimum overall control efficiency of 95%.

(b) The input of any single HAP to the spray paint booths shall not exceed 198 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The input of any combination of HAPs to the spray paint booths shall not exceed 495.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above usage limits in addition to operating the thermal oxidizer with a minimum overall control efficiency of 95% at all times that the four (4) spray paint booths (PB-1 through PB-4) are in operation combined with the potential HAP emissions from the insignificant activities will limit emissions of any single HAP from the entire source to less than ten (10) tons per twelve (12) consecutive month period and will limit the emissions of any combination of HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period.

The HAP input limits were calculated as follows:

HAP Input = (9.9 tons/year) / (1 - EF) = 198 tons of a single HAP per year

HAP Input = (24.79 tons/year) / (1 - EF) = 495.8 tons of total HAPs per year

Where EF equals 95% (the overall control efficiency of the thermal oxidizer).

The unrestricted potential emissions of volatile organic compounds (VOC) are greater than 100 tons per year. The source has agreed to limit the emissions of VOC to less than 100 tons per year by limiting the amount of VOC used in the spray paint booths and using the regenerative thermal oxidizer. The VOC limit is as follows:

(a) The VOC emissions from the paint booths PB-1, PB-2, PB-3 and PB-4 shall be controlled using the regenerative thermal oxidizer with a minimum overall control efficiency of 95%.

(b) The total input of VOC to spray paint booths PB-1, PB-2, PB-3 and PB-4 shall not exceed 1,991.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above usage limit in addition to operating the thermal oxidizer with a minimum overall control efficiency of 95% at all times that the four (4) spray paint booths (PB-1 through PB-4) are in operation combined with the potential VOC emissions from the insignificant activities will limit emissions of VOC from the entire source to less than 100 tons per twelve (12) consecutive month period.

This limit was calculated as follows:

VOC Input = (99.59 tons/year) / (1 - EF) = 1,991.8 tons of VOC per year

Stack tests were performed on the regenerative thermal oxidizer controlling VOC and HAP emissions from paint spray booths PB-1 through PB-4 and the 5.175 MMBtu per hour curing oven on August 22, 2002. The capture efficiency of the enclosure for the spray booths was measured to be 100% (permanent total enclosure) and the destruction efficiency of the thermal oxidizer was measured to be 98.4% for an overall control efficiency of the thermal oxidizer of 98.4% and was determined to be in compliance.

The unrestricted potential emissions of PM-10 are greater than 100 tons per year. Emissions of PM-10 shall be limited to less than 100 tons per year as follows:

(a) The coatings applied by paint booths PB-1, PB-2, PB-3 and PB-4 shall be limited such that the total PM10 emissions shall not exceed 99.47 tons per twelve consecutive month period with compliance determined at the end of each month.

(b) The overall control efficiency for particulate matter in the paint booths PB-1, PB-2, PB-3 and PB-4, taking into account the transfer efficiency and dry filter control efficiency, shall not be less than 91.67%.

Compliance with these limits will make the provisions of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable to this source.

Compliance with the above limit shall be determined by calculating the PM10 emissions associated with each coating applied by paint booths PB-1, PB-2, PB-3 and PB-4 using the following equation:

$$PM/PM10 = \sum(CU \times D \times W\%S) \times (1-(OCE/100)) \times 1/2000$$

Where:

PM10 = The total PM10 emissions (ton/month) for all coatings.

CU = The total coating use (gal coating/month) of each coating.

D = The density (lb coating/gal coating) of each coating.

W%S = The weight percent solids (lb solids/lb coating) of each coating.

OCE = The overall particulate matter control efficiency of the spray booths. This value shall equal 91.67% unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

The total PM10 emissions (tons/month) from paint booths PB-1, PB-2, PB-3 and PB-4 is equal to the sum of the PM10 emissions associated with each coating applied by those booths.

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 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to this rule because the fugitive particulate matter emissions from the paved and unpaved roadways are negligible. There are no other sources of fugitive particulate matter emissions at this source.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)
The applicable HAP limits pursuant to 326 IAC 2-8 (FESOP) discussed above limit emissions to less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the four (4) spray paint booths (PB-1, PB-2, PB-3, and PB-4) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This limit applies to the following insignificant activities:

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(b) Activities with uncontrolled emissions equal to or less than the exemption thresholds provided in 326 IAC 2-1.1-3(d)(1), including:

(1) Grinding operations.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)
The four (4) spray paint booths PB-1, PB-2, PB-3, and PB-4 are not subject to the requirements of this rule because they are subject to the requirements of 326 IAC 8-2-9 discussed below.

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

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the four (4) spray paint booths PB-1, PB-2, PB-3, and PB-4 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings. The source has opted to comply with this limitation using a regenerative thermal oxidizer for VOC control.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the four (4) spray paint booths PB-1, PB-2, PB-3, and PB-4 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a). The equivalent emissions limit was calculated to be 6.67 pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D)) = 3.5 / (1 - (3.5/7.36) = 6.67 \text{ lbs VOC/gallon of coating solids}$$

Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC = 7.36 lbs/gal;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

(c) Pursuant to 326 IAC 8-1-2(c) and an overall efficiency of the thermal oxidizer of 95%, the VOC content of the coating shall not exceed 133.4 pounds of VOC per gallon of coating solids delivered to the applicator calculated by the following equation:

$$O = \frac{V - E}{V} X\ 100$$

$$95\% = \frac{V - 6.67}{V} x\ 100$$

V = 133.4 lbs/gallon of coating solids

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied = 6.67 lbs/gallon.

O = Equivalent overall efficiency of the capture system and control device as a percentage = 95%.

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

Stack tests were performed on the regenerative thermal oxidizer controlling VOC emissions from paint spray booths PB-1 through PB-4 and the 5.175 MMBtu per hour curing oven on August 22, 2002. The overall control efficiency of the thermal oxidizer was measured to be 98.4% and was determined to be in compliance.

326 IAC 4-2 (Incinerators)

The one (1) natural gas-fired burn off oven with a maximum heat input capacity of 0.78 MMBtu per hour, is subject to this rule because it meets the definition of an incinerator. Pursuant to 326 IAC 4-2, the following shall apply to the burn off oven:

(a) All incinerators shall comply with the following requirements:

(1) Consist of primary and secondary chambers or the equivalent.

(2) Be equipped with a primary burner unless burning only wood products.

(3) Comply with 326 IAC 5-1 and 326 IAC 2.

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c) of the rule (included as paragraph (b) below).

(5) Not emit particulate matter in excess of one (1) of the following:

(A) Three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.

(B) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

(6) If any of the requirements of subdivisions (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(b) An owner or operator developing an operation and maintenance plan pursuant to subsection (a)(4) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (a)(5) and include the following:

(A) Procedures for receiving, handling, and charging waste.

(B) Procedures for incinerator startup and shutdown.

(C) Procedures for responding to a malfunction.

(D) Procedures for maintaining proper combustion air supply levels.

(E) Procedures for operating the incinerator and associated air pollution control systems.

(F) Procedures for handling ash.

(G) A list of wastes that can be burned in the incinerator.

(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(3) The operation and maintenance plan must be readily accessible to incinerator operators.

(4) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(c) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

326 IAC 8-3 (Organic Solvent Degreasing Operations)
The degreasing operations are not subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations), because the source performs only hand-wipe degreasing operations.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The burn off oven is subject to this rule because it was constructed after March 21, 1972 and an emission limit has been established under 326 IAC 9-1-2 for this type of unit. Pursuant to 326 IAC 9-1-2(a)(3), the source shall not operate a refuse incinerator or refuse burning equipment unless the waste gas stream is burned in one (1) of the following:

(A) Direct-flame afterburner.

(B) Secondary chamber.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

The compliance determination requirements applicable to this source are as follows:

(a) Compliance with the PM limit to render 326 IAC 2-2 (PSD) not applicable and the PM10 limit to render the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable to this source shall be determined by calculating the PM and PM10 emissions associated with each coating applied by paint booths PB-1, PB-2, PB-3 and PB-4 using the following equation:

$$PM/PM10 = \sum(CU \times D \times W\%S) \times (1-(OCE/100)) \times 1/2000$$

Where:

PM/PM10 = The total PM/PM10 emissions (ton/month) for all coatings.

CU = The total coating use (gal coating/month) of each coating.

D = The density (lb coating/gal coating) of each coating.

W%S = The weight percent solids (lb solids/lb coating) of each coating.

OCE = The overall particulate matter control efficiency of the spray booths. This value shall equal 91.67% unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

The total PM/PM10 emissions (ton/month) from paint booths PB-1, PB-2, PB-3 and PB-4 is equal to the sum of the PM/PM10 emissions associated with each coating applied by those booths.

(b) No later than 180 days after issuance of F109-23612-00021, the Permittee shall conduct overall particulate matter control efficiency testing on one (1) of the booths subject to the PM and PM10 limits to render 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable. The testing shall be done on a booth that has not been tested for overall control efficiency in the past ten (10) years. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

(c) No later than 180 days after issuance of F109-23612-00021, the Permittee shall conduct a performance test to verify the VOC and HAP overall control efficiency of the thermal oxidizer used to achieve the VOC and HAP limits that render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

The compliance monitoring requirements applicable to this source are as follows:

Control	**Parameter**	**Frequency**	**Range**	**Excursions and Exceedances**
RTO	Temperature	Continuous	1540 - 1590°F	Response Steps
	Fan Amperage	Daily	70 - 74	
Dry Filters	Placement, integrity and particle loading of the filters	Daily Inspections	Normal-Abnormal	Response Steps
	Overspray	Weekly observations and monthly inspections	Normal-Abnormal	

These monitoring conditions are necessary because the RTO controlling VOC emissions from the four (4) paint booths PB-1, PB-2, PB-3 and PB-4 must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and to render the requirements of 326 IAC 2-2 (PSD) not applicable. They are also necessary because the dry filters for the four (4) paint booths PB-1, PB-2, PB-3 and PB-4 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP) and to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

Recommendation

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

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

An application for the purposes of this review was received on September 5, 2006. Additional information was received on August 31, 2007.

Conclusion

The operation of this architectural metal work plant, manufacturing aluminum skylights, handrails, and other architectural metal parts, shall be subject to the conditions of the attached FESOP Renewal No. F109-23612-00021.

Appendix A: Emission Calculations

Company Name: Signature Skylights, LLC d/b/a LinEl Signature
Address City IN Zip: 101 Linel Drive, Mooresville, IN 46158
Permit Number: F109-23612-00021
Plt ID: 109-00021
Reviewer: ERG/TE
Date: 09/11/07

Unrestricted Potential Emissions (tons/year)

Emissions Generating Activity			
Pollutant	Surface Coating	Natural Gas Combustion	**TOTAL**
PM	417.85	0.11	417.96
PM10	417.85	0.43	418.28
SO2	0.00	0.03	0.03
NOx	0.00	5.67	5.67
VOC	1,951.54	0.31	1,951.86
CO	0.00	4.77	4.77
total HAPs	1,262.76	0.11	1,262.86
worst case single HAP	(Xylene) 316.47	(Hexane) 0.10	(Xylene) 316.47

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity			
Pollutant	Surface Coating	Natural Gas Combustion	**TOTAL**
PM	99.47	0.11	99.58
PM10	99.47	0.43	99.90
SO2	0.00	0.03	0.03
NOx	0.00	5.67	5.67
VOC	99.59	0.31	99.90
CO	0.00	4.77	4.77
total HAPs	24.79	0.11	24.90
worst case single HAP	9.90	(Hexane) 0.10	9.90

Total emissions based on rated capacity at 8,760 hours/year, after control.

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

Company Name: Signature Skylights, LLC d/b/a LinEl Signature
Address City IN Zip: 101 Linel Drive, Mooresville, IN 46158
Permit Number: F109-23612-00021
Plt ID: 109-00021
Reviewer: ERG/TE
Date: 09/11/07

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/sq. ft.)	Maximum (sq. ft./hour)	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
Paint Booth 1																
Primer	9.32	59.87%	0.0%	59.9%	0.0%	20.50%	0.00666	2880.000	5.58	5.58	107.03	2568.64	468.78	109.97	27.22	65%
Paint Booth 2																
Primer	9.32	59.87%	0.0%	59.9%	0.0%	20.50%	0.00666	2880.000	5.58	5.58	107.03	2568.64	468.78	109.97	27.22	65%
Paint Booth 3																
Top Coat	9.40	64.20%	0.0%	64.2%	0.0%	21.68%	0.00666	2880.000	6.03	6.03	115.75	2778.06	507.00	98.95	27.84	65%
Paint Booth 4																
Top Coat	9.40	64.20%	0.0%	64.2%	0.0%	21.68%	0.00666	2880.000	6.03	6.03	115.75	2778.06	507.00	98.95	27.84	65%

Potential Emissions Before Control	**445.56**	**10,693.39**	**1,951.54**	**417.85**
Potential Emissions After Control	**22.28**	**534.67**	**97.58**	**41.79**
Maximum Allowable Emissions Before Control			**1,991.80**	**2,842.00**
Maximum Allowable Emissions After Control			**99.59**	**99.47**

Dry filters particulate control efficiency: 90.00%
Thermal Oxidizer Minimum Control Efficiency: 95.00%

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/sq. ft.) * Maximum (sq. ft./hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/sq. ft.) * Maximum (sq. ft./hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/sq. ft.) * Maximum (sq. ft./hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (sq. ft./hour) * (gal/sq. ft.) * (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 = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations

Company Name: Signature Skylights, LLC d/b/a LinEl Signature
Address City IN Zip: 101 Linel Drive, Mooresville, IN 46158
Permit Number: F109-23612-00021
Plt ID: 109-00021
Reviewer: ERG/TE
Date: 09/11/07

Material	Density (Lb/Gal)	Gallons of Material (gal/sq. ft.)	Maximum (sq. ft./hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ethers	Weight % Ethylbenzene	Weight % Chromium Compounds	Weight % Dimethyl Phthalate	Weight % MIBK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Chromium Compounds Emissions (ton/yr)	Dimethyl Phthalate Emissions (ton/yr)	MIBK Emissions (ton/yr)
Paint Booth 1																	
Primer	9.32	0.00666	2880.000	7.40%	7.19%	7.71%	1.70%	0.96%	7.29%	4.12%	57.94	56.30	60.37	13.31	7.52	57.08	32.26
Paint Booth 2																	
Primer	9.32	0.00666	2880.000	7.40%	7.19%	7.71%	1.70%	0.96%	7.29%	4.12%	57.94	56.30	60.37	13.31	7.52	57.08	32.26
Paint Booth 3																	
Top Coat	9.40	0.00666	2880.000	12.70%	5.44%	5.96%	2.50%	0.00%	8.63%	8.66%	100.29	42.96	47.07	19.74	0.00	68.15	68.39
Paint Booth 4																	
Top Coat	9.40	0.00666	2880.000	12.70%	5.44%	5.96%	2.50%	0.00%	8.63%	8.66%	100.29	42.96	47.07	19.74	0.00	68.15	68.39

Potential Emissions Before Controls	**316.47**	**198.51**	**214.87**	**66.11**	**15.03**	**250.46**	**201.30**
Potential Emissions After Controls	**15.82**	**9.93**	**10.74**	**3.31**	**0.75**	**12.52**	**10.06**

Worst Case Single HAP Emissions Before Controls (tons/yr) = **316.47**
Worst Case Single HAP Emissions After Controls (tons/yr) = **15.82**
Limited Single HAP Emissions Before Controls (tons/yr) = **198.00**
Limited Single HAP Emissions After Controls (tons/yr) = **9.90**

Total HAP Emissions Before Controls (tons/yr) = **1,262.76**
Total HAP Emissions After Controls (tons/yr) = **63.14**
Limited Total HAP Emissions Before Controls (tons/yr) = **495.80**
Limited Total HAP Emissions After Controls (tons/yr) = **24.79**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/sq. ft.) * Maximum (sq. ft./hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Ovens and Heaters

Company Name: **Signature Skylights, LLC d/b/a LinEl Signature**
Address City IN Zip: **101 Linel Drive, Mooresville, IN 46158**
Permit Number: **F109-23612-00021**
Plt ID: **109-00021**
Reviewer: **ERG/TE**
Date: **09/11/07**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
12.955	113.486

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.11	0.43	0.03	5.67	0.31	4.77

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Ovens and Heaters
HAPs Emissions

Company Name: Signature Skylights, LLC d/b/a LinEl Signature
Address City IN Zip: 101 Linel Drive, Mooresville, IN 46158
Permit Number: F109-23612-00021
Plt ID: 109-00021
Reviewer: ERG/TE
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	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.192E-04	6.809E-05	4.256E-03	1.021E-01	1.929E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.837E-05	6.242E-05	7.944E-05	2.156E-05	1.192E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.