



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: April 5, 2007
RE: ET&T Enterprises, a Division of Holland Metal Fab, Inc. / 039-23670-00170
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**ET & T Enterprises, A Division of Holland Metal Fab., Inc.
28816 Ventura Drive
Elkhart, Indiana 46517**

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

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

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

Operation Permit No.: MSOP 039-23670-00170	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 5, 2007 Expiration Date: April 5, 2012

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Source Definition [326 IAC 2-7-1(22)]	
A.3	Emission Units and Pollution Control Equipment Summary	
B	GENERAL CONDITIONS	6
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability	
B.5	Severability	
B.6	Property Rights or Exclusive Privilege	
B.7	Duty to Provide Information	
B.8	Certification	
B.9	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13	Permit Renewal [326 IAC 2-6.1-7]	
B.14	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15	Source Modification Requirement	
B.16	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.17	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18	Annual Fee Payment [326 IAC 2-1.1-7]	
B.19	Credible Evidence [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS.....	11
	Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.6	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.7	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8	Compliance Monitoring [326 IAC 2-1.1-11]	
C.9	Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.10	Instrument Specifications [326 IAC 2-1.1-11]	
C.11	Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]	
C.12	Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]	

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

- C.13 Malfunctions Report [326 IAC 1-6-2]
- C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

D.1 EMISSIONS UNIT OPERATION CONDITIONS - Spray Booth..... 18

Emission Limitations and Standards

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]
- D.1.3 Particulate [326 IAC 6-3-2(d)]

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

- D.1.4 Volatile Organic Compounds (VOC)

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

- D.1.5 Record Keeping Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS - Powder Booth & Pneumatic Blasting Guns 20

Emission Limitations and Standards

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

Compliance Determination Requirements

- D.2.2 Particulate Control

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

- D.2.3 Visible Emissions Notations
- D.2.4 Parametric Monitoring

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.2.5 Record Keeping Requirements

MSOP Certification Form.....	22
Annual Notification	23
Malfunction Report	24

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary custom welding and finishing of dump boxes and shipping container conversion operation.

Source Address: 28816 Ventura Drive, Elkhart, Indiana 46517
Mailing Address: 28816 Ventura Drive, Elkhart, Indiana 46517
General Source Phone: (574) 293-9511
SIC Code: 3499
County Location: Elkhart
Source Location Status: Nonattainment for 8-hour Ozone
Attainment area for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD and Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition [326 IAC 2-7-1(22)]

This custom welding and finishing of dump boxes and shipping container conversion operation consists of two (2) plants:

- (a) Plant 1 is located at 28816 Ventura Drive, Elkhart, Indiana 46517; and
- (b) Plant 2 is located at 58391 Ventura Drive, Elkhart, Indiana 46517.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source, effective from Part 70 permit no. T039-7470-00170 issuance date of February 18, 1999.

A.3 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) spray booth, installed in 1992 and identified as EU-15, with a maximum capacity of 0.25 metal shipping container conversions per hour, using dry filters as control, exhausting to two (2) stacks (SV-15 and SV-16).
- (b) One (1) powder coating booth, installed in 1999 and identified as Powder booth 1, using a dust collector which collects and recycles the coating powder and is considered to be an integral part of the process, and exhausting within the building.
- (c) Two (2) aluminum oxide pneumatic blasting guns, installed in 1999 and identified as Blast guns 1 and 2, with a maximum capacity of 20 frames per hour, using a dust collector (ID SM-1) as particulate control, and exhausting fugitively within the building.

- (d) Eight (8) MIG welders.
- (e) Two (2) plasma cutters; and
- (f) One (1) natural gas-fired combustion unit with maximum heat input 3.9 MMBtu per hour.
- (g) A small wood cutting operation, constructed in 2005, consisting of one (1) 10" table saw and two(2) chop saws; and
- (h) Adhesive application with hand-held caulk guns, constructed in 2005.

SECTION B GENERAL CONDITIONS

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

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

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

-
- (a) This permit, MSOP 039-23670-00170, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by 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

- (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 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) Authorized Individual is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) All terms and conditions of permits established prior to MSOP 039-23670-00170 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by the "Authorized Individual" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

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

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

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

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

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

The application which shall be submitted by the Permittee does require the certification by "Authorized Individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice only changes addressed in the request for notice only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by "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 "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.7 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall 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 the parameters.

C.11 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;

- (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.
- (f) For the purposes of this Condition:
 - (1) "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions are, or opacity is, greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement), consistent with any averaging period specified for averaging the results of the monitoring.
 - (2) "Excursion" shall mean a departure from an indicator range established for monitoring under Section D of this permit, consistent with any averaging period specified for averaging the results of the monitoring.

C.12 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 and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

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

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

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

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

- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by "Authorized Individual" as defined by 326 IAC 2-1.1-1(1).

- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray booth, installed in 1992 and identified as EU-15, with a maximum capacity of 0.25 metal shipping container conversions per hour, using dry filters as control, exhausting to two (2) stacks (SV-15 and SV-16).

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating operation, identified as EU-15 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

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

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

Pursuant to 326 IAC 6-3-2(d):

- (a) Particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Volatile Organic Compounds (VOC)

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

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on month 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 solvent.
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for month;
 - (5) The VOC usage for each month; and
 - (6) The calculated VOC per gallon of coating, less water.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain a log of weekly overspray observations.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) powder coating booth, installed in 1999 and identified as Powder booth 1, using a dust collector which collects and recycles the coating powder and is considered to be an integral part of the process, and exhausting within the building.
- (b) Two (2) aluminum oxide pneumatic blasting guns, installed in 1999 and identified as Blast guns 1 and 2, with a maximum capacity of 20 frames per hour, using a dust collector (ID SM-1) as particulate control, and exhausting fugitively within the building.

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate emissions from two (2) aluminum oxide pneumatic blasting guns shall not exceed 2.242 pound per hour when operating at a process weight rate of 812.9 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements

D.2.2 Particulate Control

Pursuant to T039-17642-00170, issued on February 19, 2004,

- (a) The dust collector for particulate control shall be in operation and control emissions from the powder booth at all times that the powder coating booth is in operation.
- (b) In order to comply with D.2.1, the dust collector for particulate control shall be in operation and control emissions from the two (2) aluminum oxide pneumatic blasting guns at all times that the two (2) aluminum oxide pneumatic blasting guns are in operation.

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

D.2.3 Visible Emissions Notations

- (a) Daily visible emission notations of each shot blast stack exhaust shall be performed during normal daylight operations when exhausting to atmosphere. Visible emissions notations are not required when venting indoors. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are 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.

D.2.4 Parametric Monitoring

The Permittee shall record the total static pressure drop across the each dust collector used in conjunction with the shot blasting process, at least once per day when the process is in operation when venting to the atmosphere and is not required when venting indoors. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 5.0 inches of water 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 pressure reading that is outside the above mentioned range 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.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of each shot blast exhaust once per day, or when visible emissions notations were not taken and the reason for it.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain records once per day of the pressure drop.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: ET & T Enterprises, A Division of Holland Metal Fab., Inc
Source Address: 28816 Ventura Drive, Elkhart, Indiana 46517
Mailing Address: 28816 Ventura Drive, Elkhart, Indiana 46517
MSOP No.: 039-23670-170

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 Notification
- 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**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Address:	28816 Ventura Drive,
City:	Elkhart, Indiana 46517,
Phone #:	574-293-9511
MSOP #:	039-23670-00170

I hereby certify that ET & T Enterprises, A Division of Holland Metal Fab., Inc. is

- still in operation.
- no longer in operation.

I hereby certify that ET & T Enterprises, A Division of Holland Metal Fab., Inc. is

- in compliance with the requirements of MSOP 039-23670-00170.
- not in compliance with the requirements of MSOP 039-23670-00170.

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

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

Noncompliance:

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

PAGE 1 OF 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Elkhart, Indiana
Permit Reviewer: Surya Ramaswamy/EVP

Page 26 of 26
MSOP 039-23670-00170

PAGE 2 OF 2

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

Addendum to the
Technical Support Document for Minor Source Operating Permit

Source Name:	ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Source Location:	28816 Ventura Drive, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3499
Permit No.:	MSOP 039-23670-00170
Permit Reviewer:	Surya Ramaswamy / EVP

On February 14, 2007, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that ET & T Enterprises, A Division of Holland Metal Fab., Inc. had applied for a Minor Source Operating Permit (MSOP) to operate a fabrication and surface coating of metal components, dump boxes and shipping container conversions facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 12, 2006, Brian Jozwiak, Operation Manager at ET & T Enterprises, A Division of Holland Metal Fab., Inc. submitted comments on the proposed MSOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1:

Condition D.1.5 (a) covering record keeping requirements to document compliance with Condition D.1.1 contains daily record keeping requirements. However, Condition D.1.1 contains no daily record keeping requirements and no daily volume weighted averaging requirements. Please modify the draft language contained in Condition D.1.5 (a) to require that records to demonstrate compliance with Condition D.1.1 be kept on a monthly basis.

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The volume weighted VOC content of the coatings used for each month;

- (4) The cleanup solvent usage for each month;
 - (5) The VOC usage for each month; and
 - (6) The calculated VOC per gallon of coating, less water.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain a log of overspray observations.
 - (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

Response 1:

Condition D.1.1 contains a 326 IAC 8-2-9 limit for surface coating operation identified as EU-15. Based on the information from the source, EU-15 will be able to comply with the 326 IAC 8-2-9 limit of 3.5 lb/gal without volume weighted averaging and it will be sufficient to keep monthly records instead of daily. Therefore the Condition D.1.4 has been revised as follows to reflect these changes:

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(6)** below. Records maintained for (1) through ~~(5)~~ **(6)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on ~~daily~~ **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 solvent.
 - (3) The volume weighted ~~average~~ VOC content of the coatings used for each ~~day~~ **month**;
 - (4) The cleanup solvent usage **for each month**;
 - (5) The VOC usage for each month; and**
 - (6)** ~~(5)~~ The calculated VOC per gallon of coating, less water.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain a log of weekly overspray observations.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, IDEM, OAQ has decided to make changes to the permit as indicated below. Any permit changes affecting the permit's Table of Contents are also revised without replication herein.

In the technical support document (TSD) it was determined that the adhesive operation at the source does not qualify as a surface coating operation and therefore not subject to the requirements of 326 IAC 8-2-9 and 326 IAC 8-2-12. However, pursuant to 326 IAC 8-1-0.5(c), "Coating" means the application of protective, functional, or decorative films, and since the adhesive is a functional, the adhesive operation does qualify as a surface coating operation. Regardless of this determination, the actual VOC emissions are less than 15 pounds per day, therefore pursuant to 326 IAC 8-2-1(a)(4), the adhesive operation is exempt from the requirements of 326 IAC 8-2-9 and 326 IAC 8-2-12.

These revisions will not affect any conditions in the permit. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the technical support document that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The TSD should have read as follows:

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the one (1) spray booth, constructed in 1992, identified as EU-15, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

Based on the MSDS submitted by the source and calculations made by OAQ, both spray booths will be able to comply with this requirement because they will be using complaint coatings.

~~The adhesive application is not a surface coating process. The requirements of 326 IAC 8-2-9 do not apply to this operation because the adhesive application operations are exempt from the rule as specified in 326 IAC 8-2-9(b).~~

Based on the information from source regarding the adhesive application, the requirements of 326 IAC 8-2-9 do not apply to this operation because the actual VOC emissions from adhesive application are less than 15 pounds per day, therefore pursuant to 326 IAC 8-2-1(a)(4), the adhesive operation is exempt from the requirements of 326 IAC 8-2-9.

Powder coating operation does not emit any VOC emissions. Therefore the powder coating operations are not subject to 326 IAC 8-2-9.

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

~~The adhesive application is not a surface coating process. However, the adhesives are applied manually using caulking guns, considered to be 100% transfer efficiency. Therefore there is no particulate emission from the adhesive application. Thus, the adhesive application is determined to be exempt from the requirements of 326 IAC 6-3.~~

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

~~The adhesive application associated with this source is not subject to this rule. It was determined that this adhesive application is not subject to this rule because manual adhesive application is not deemed to be surface coating operation.~~

Based on the information from source regarding the adhesive application, the requirements of 326 IAC 8-2-12 do not apply to this operation because the actual VOC emissions from adhesive application is less than 15 pounds per day, therefore pursuant to 326 IAC 8-2-1(a)(4), the adhesive operation is exempt from the requirements of 326 IAC 8-2-12.

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

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

Source Background and Description

Source Name:	ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Source Location:	28816 Ventura Drive, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3499
Permit No.:	MSOP 039-23670-00170
Permit Reviewer:	Surya Ramaswamy / EVP

The Office of Air Quality (OAQ) has reviewed an application from ET & T Enterprises relating to the fabrication and surface coating of metal components, dump boxes and shipping container conversions. ET & T Enterprises was issued Part 70 permit no. T039-17642-00170 on February 19, 2004.

History

On September 20, 2006, IDEM, OAQ received an application from ET & T Enterprises requesting a transition from their existing Part 70 Permit No. T039-17642-00170 issued on February 19, 2004 to an MSOP because the VOC emissions have decreased due to a change in the coatings used. This application also includes the request for addition of an unpermitted wood cutting and adhesive application operation to the permit. In addition, ET & T Enterprises will perform custom welding and finishing operations and no longer manufacture metal trailer frames. As a result, ET & T Enterprises' potential to emit would be below the title V thresholds and can therefore qualify for a Minor Source Operating Permit.

Source Definition

This custom welding and finishing of metal components, dump boxes and shipping container operation consists of two (2) plants:

- (a) Plant 1 is located at 28816 Ventura Drive, Elkhart, Indiana 46517; and
- (b) Plant 2 is located at 58391 Ventura Drive, Elkhart, Indiana 46517.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source, effective from Part 70 Permit No. T039-7470-00170 issued on February 18, 1999.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) spray booth, installed in 1992 and identified as EU-15, with a maximum capacity of 0.25 metal shipping container conversions per hour, using dry filters as control, exhausting to two (2) stacks (SV-15 and SV-16).
- (b) One (1) powder coating booth, installed in 1999 and identified as Powder booth 1, using a dust collector which collects and recycles the coating powder and is considered to be an integral part of the process, and exhausting within the building.

- (c) Two (2) aluminum oxide pneumatic blasting guns, installed in 1999 and identified as Blast guns 1 and 2, with a maximum capacity of 20 frames per hour, using a dust collector (ID SM-1) as particulate control, and exhausting fugitively within the building.
- (d) Eight (8) MIG welders.
- (e) Two (2) plasma cutters; and
- (f) One (1) natural gas-fired combustion unit with maximum heat input 3.9 MMBtu per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

- (a) A small wood cutting operation, constructed in 2005, consisting of one (1) 10" table saw and two (2) chop saws; and
- (b) Adhesive Application with hand-held caulk guns, constructed in 2005.

Existing Approvals

The source was issued a Part 70 Operating Permit No. T039-17642-00170 on February 19, 2004. The source has since received the following:

- (a) First Administrative Amendment No.:039-19932-00170 issued on February 16, 2005; and
- (b) Second Administrative Amendment No.:039-21233-00170 issued on June 14, 2005.

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.

Air Pollution Control Justification as an Integral Part of the Process

Pursuant to the Significant Source Modification No. 039-11051-00170, dated October 15, 1999, the dust control system is considered as an integral part of the powder coating process. The justification for this is given below:

The company has submitted the following justifications such that the dust collection system be considered as an integral part of the powder coating process:

- (a) The dust collector and powder coating guns are interconnected to prevent operation of guns without the collection system. This is sometimes referred to as a lock out system.
- (b) 100% of the powder collected in these filters is recycled back into the powder reservoir for future surface coating. Without the filters, the economic loss of powder would be great.
- (c) Installation of the control equipment will have the following economic impact:
20 frames per hour, with 1.33 lbs. of powder material sprayed per frame = 26.6 lbs/hr
26.6 lbs/hr x 33 % overspray loss = 8.778 lbs/hr loss
8.778 x 8,760 hours = 76,895.0 lbs/yr x \$2.50 lb = \$192,237.00 year savings by using control equipment

The positive net economic effect of this control equipment must be considered to put ET & T Enterprises on the same level as their competitors. It should also be noted that plant 1 will decrease its use of solvent based paint by approximately 80% when this powder system is in full operation.

The OAQ has evaluated the justifications and agreed that the dust collector will be considered as an integral part of the powder coating process. Therefore, the permitting level will be determined using the potential emissions after the dust collector. Operating conditions will be specified in the proposed permit that this dust collector shall operate at all times when the powder coating process is in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on on September 20, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Pages 1 through 8).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	90.64
PM-10	90.64
SO ₂	0.01
VOC	24.14
CO	1.42
NO _x	1.69

HAPs	Potential to Emit (tons/yr)
Xylene	0.18
Manganese	0.39
Total	0.57

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than one hundred (100) tons per year and the potential to emit of PM/PM₁₀ is greater than twenty five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of the combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not a major source of HAPs as defined in 326 IAC 2-7-1(22).
- (c) **Fugitive Emissions**
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

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

- (a) Elkhart County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. 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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Elkhart 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 for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	9.10
PM-10	9.10
SO ₂	0.01
VOC	24.14
CO	1.42
NO _x	1.69
Single HAP	0.39
Combination HAPs	0.57

- (a) This existing source is not a major stationary source for the purpose of PSD and nonattainment NSR because no attainment regulated pollutant is emitted at a rate of 250 tons per year, and no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions are based on the emission calculations (Appendix A) in this MSOP Permit.

Federal Rule Applicability

- (a) The requirements of New Source Performance Standard (NSPS), 326 IAC 12 and 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in the permit for the natural gas fired combustion unit (Non- Boiler). This NSPS applies only to boilers or process heaters with a maximum heat input capacity greater than ten (10) MMBtu per hour. However the insignificant natural gas-fired combustion unit operates at a maximum heat input capacity of less than 10 MMBtu per hour.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for surface coating of miscellaneous metal parts and products (40 CFR Part 63.3880, Subpart Mmmm) are not included in the permit because this source consisting of a surface coating operation is not a major source of HAPs. The potential to emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for surface coating of wood building products, 326 IAC 20 (40 CFR Part 63.4680, Subpart Qqqq) are not included in the permit because this source consisting of surface coating operation is not a major source of HAPs. The potential to emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.
- (e) The requirements of 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, are not included in the permit for the natural gas fired combustion unit (Non-Boiler) rated at a capacity of 3.9 MMBtu/hr because this source is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This existing source, constructed in 1992, is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories. After the initial part 70 permit was issued, the source was issued a significant source modification for installing one (1) powder coating booth and two (2) aluminum oxide pneumatic blasting guns. The source, after the modification, is still a minor source under PSD because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more. Therefore, the requirements of 326 IAC 2-2 are not applicable to this source.

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

This source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the one (1) spray booth, constructed in 1992, identified as EU-15, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

Based on the MSDS submitted by the source and calculations made by OAQ, both spray booths will be able to comply with this requirement because they will be using complaint coatings.

The adhesive application is not a surface coating process. The requirements of 326 IAC 8-2-9 do not apply to this operation because the adhesive application operations are exempt from the rule as specified in 326 IAC 8-2-9(b).

Powder coating operation does not emit any VOC emissions. Therefore the powder coating operations are not subject to 326 IAC 8-2-9.

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operation, identified as EU-15, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with the manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(e) (Particulate Emissions Limitations for Manufacturing Process), the particulate from each aluminum oxide pneumatic blasting gun shall not exceed 2.24 pound per hour when operating at a process weight rate of 812.9 pounds per hour. These limits are determined using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10(0.406)^{0.67} = 2.242 \text{ pounds per hour}$$

The controlled particulate emissions from two (2) aluminum oxide pneumatic blasting guns are 0.002 pounds per hour. Therefore, the two (2) aluminum oxide pneumatic blasting guns will be able to comply with the requirements of 326 IAC 6-3-2.

- (c) Powder coating operation has potential emissions of 0.01 pounds per hour (less than 0.551 pounds per hour). Therefore, pursuant to 326 IAC 6-3-1(b), the powder coating operation is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes).
- (d) The welding operations at each station, consume less than six hundred twenty-five (625) pounds of rod per day and the wood cutting operations have potential emissions less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b), the welding and cutting operations are exempt from the requirements of 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes).

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

The adhesive application is not a surface coating process. However, the adhesives are applied manually using caulking guns, considered to be 100% transfer efficiency. Therefore there is no particulate emission from the adhesive application. Thus, the adhesive application is determined to be exempt from the requirements of 326 IAC 6-3.

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

The adhesive application associated with this source is not subject to this rule. It was determined that this adhesive application is not subject to this rule because manual adhesive application is not deemed to be surface coating operation.

Spray booths coat only metal shipping container. Therefore 326 IAC 8-2-12 is not subject to the spray booths.

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

Pursuant to 326 IAC 8-1-6, new facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons or more per year, and which are not otherwise regulated by another provision of Article 8, are subject to the requirements of this rule. The potential to emit of VOC from surface coating facilities is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to the surface coating operations.

Testing Requirements

Testing is not required for shot blasters as the margin of compliance is large. The control device will be able to meet the 2.242 lbs/hr limit at a required control efficiency of 88%.

Compliance Requirements

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 monitoring requirements applicable to this source are as follows:

1. The surface coating operation, identified as EU-15, has applicable compliance monitoring conditions as specified below:
 - (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 (SV-15 and SV-16) 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.
2. The shot blast units has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of each shot blast stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. Visible emissions notations are not required when venting indoors. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are 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.
- (f) The Permittee shall record the total static pressure drop across the each dust collector used in conjunction with the shot blasting process, at least once per day when the process is in operation when venting to the atmosphere and is not required when venting indoors. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 5.0 inches of water 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 pressure reading that is outside the above mentioned range 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.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (g) In the event that bag failure has been observed:
 - (1) For a single compartment dust collector controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
 - (2) For a single compartment dust collector controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the dry filters for the surface coating operation must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-6.1 (MSOP).

Conclusion

The operation of this custom welding and finishing of metal components, dump boxes and shipping container conversion operation shall be subject to the conditions of the attached proposed Minor Source Operating Permit 039-23670-00170.

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

Company Name: ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Address City IN Zip: 28816 Ventura Drive, Elkhart, Indiana 46517
Plt ID: T039-23670-00170
Reviewer: Surya Ramaswamy / EVP
Date: 4/9/2007

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/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
ACP-8173 Enamel	10.8	32.00%	0.0%	32.0%	0.0%	68.00%	1.50000	0.250	3.46	3.44	1.29	30.96	5.65	2.41	5.08	80%
EM-8846 Enamel	10.9	29.00%	0.0%	29.0%	0.0%	71.00%	5.00000	0.250	3.16	3.36	4.20	100.80	18.40	8.47	4.45	80%
1093 WB Adhesive	9.0	66.00%	66.0%	0.0%	66.0%	34.00%	0.17000	0.250	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
WB Floor Adhesive	9.4	50.00%	50.0%	0.0%	50.0%	50.00%	5.00000	0.250	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%

Potential Emissions

Worst case coating added to all solvents

5.49 131.76 24.05 10.89

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Address City IN Zip: 28816 Ventura Drive, Elkhart, Indiana 46517
Plt ID: T039-23670-00170
Reviewer: Surya Ramaswamy / EVP
Date: 4/9/2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Xylene Emissions (ton/yr)
ACP-8173 Enamel	10.8	1.50000	0.250	0.24%	0.04
EM-8846 Enamel	10.9	5.00000	0.250	0.23%	0.14
1093 WB Adhesive	9.0	0.17000	0.250	0.00%	0.00
WB Floor Adhesive	9.4	5.00000	0.250	0.00%	0.00

Total State Potential Emissions

0.18

METHODOLOGY

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

**Appendix A: Emission Calculations
Abrasive Blasting - Confined**

Company Name: ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Address City IN Zip: 28816 Ventura Drive, Elkhart, Indiana 46517
Plt ID: T039-23670-00170
Reviewer: Surya Ramaswamy / EVP
Date: 4/9/2007

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM7 / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

ID1 = Nozzle internal diameter (in) from Table 3 =

503
160
99
0.5
0.5

Flow Rate (FR) (lb/hr) = 812.929 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM / lb abrasive) From Table 1 =

FR = Flow Rate (lb/hr) =

w = fraction of time of wet blasting =

N = number of nozzles =

0.010
812.929
0
2

Uncontrolled Emissions	16.26 lb/hr
	71.21 ton/yr

Controlled Emissions (C, lb/hr) for PM

CE = control efficiency =

0.99900

Controlled PM Emissions	0.01625859 lb/hr
	0.07121261 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

Appendix A: Process Particulate Emissions

Company Name: ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Address City IN Zip: 28816 Ventura Drive, Elkhart, Indiana 46517
Pit ID: T039-23670-00170
Reviewer: Surya Ramaswamy / EVP
Date: 4/9/2007

Powder Paint Booth

Transfer Efficiency 0.5
Filter Efficiency 0.999
Booth Capacity 19.84 lbs/hr of powder

Potential PM Emissions

= (19.84 lbs powder per hour) x (1-.50 transfer efficiency) x (1-.999 filter efficiency) = 0.0099 lbs PM/hr emitted
= 0.0099 lbs PM/hr x 1 ton/2000 lbs x 8760 hrs/yr = 0.043 tons PM per year.

Allowable PM Emissions determined from 326 IAC 6-3 (Process Operations)

Pursuant to 326 IAC 6-3-1 (b), the powder coating PTE is less than 0.01 lbs / hr
Hence, the powder booth operations is exempt from 326 IAC 6-3-2.

Appendix A: Emissions Calculations

Potential Emissions from Natural Gas Combustion

MM BTU/HR <100

Company Name: ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Address City IN Zip: 28816 Ventura Drive, Elkhart, Indiana 46517
Plt ID: T039-23670-00170
Reviewer: Surya Ramaswamy / EVP
Date: 4/9/2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.9

34.2

	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	0.0	0.1	0.0	1.7	0.1	1.4

*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

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

**Company Name: ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Address City IN Zip: 28816 Ventura Drive, Elkhart, Indiana 46517
Plt ID: T039-23670-00170
Reviewer: Surya Ramaswamy / EVP
Date: 4/9/2007**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Submerged Arc	0	0										
Metal Inert Gas (MIG)(E705)	8	15.25		0.0052	0.00318	0.00001	0.00001	0.634	0.388	0.001	0.001	0.390
Stick (E7014 electrode)	0	0.0		0.021	0.0005	0.0001	0.0001	0.000	0.000	0.000	0.000	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0										
Oxyacetylene(carbon steel)	0	0										
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0.0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.00000
Oxymethane	0	0	0									
Plasma	2	0.625	5	0.0022	3.30E-05	0	0	0.001	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.64				0.39
Potential Emissions lbs/day								15.25				9.37
Potential Emissions tons/year								2.78				1.71

METHODOLOGY

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb:

Appendix A: Emissions Calculations
Wood Cutting Operation

Page 7 of 8 TSD App A

Company Name: ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Address City IN Zip: 28816 Ventura Drive, Elkhart, Indiana 46517
Pit ID: T039-23670-00170
Reviewer: Surya Ramaswamy / EVP
Date: 4/9/2007

Based on the information from source, the wood cutting operation is used to make only limited custom cuts and is only active a few minutes out of each day. A worst case evaluation of the saw dust generated from this operation revealed a generation rate of 1.1 pounds of dust per hour. This results in:
1.1 *8760 hours = 9636 pounds or **4.818 tons per year** potential wood dust emissions from the cutting operations. All wood cutting is conducted inside the building. The dust generated is routinely cleaned up and properly disposed.

Appendix A: Entire Source Emission Calculations

Company Name: ET & T Enterprises, A Division of Holland Metal Fab., Inc.
Address City IN Zip: 28816 Ventura Drive, Elkhart, Indiana 46517
Plt ID: T039-23670-00170
Reviewer: Surya Ramaswamy / EVP
Date: 10/20/06

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity						
Pollutant	Surface coating operations	Natural Gas Combustion	Powder Coating Booth	Abrasive Blasting	Welding & Wood Cutting	TOTAL
PM	10.89	0.13	0.816	71.21	7.6	90.646
PM10	10.89	0.13	0.816	71.21	7.6	90.646
SO2	0	0.01	0	0	0	0.01
NOx	0	1.69	0	0	0	1.69
VOC	24.05	0.09	0	0	0	24.14
CO	0	1.42	0	0	0	1.42
total HAPs	0.18	0	0	0	1.71	1.89
single HAP	0.18	0	0	0	0.39	0.57

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

Controlled Potential Emissions (tons/year)

Emissions Generating Activity						
Pollutant	Surface coating operations	Natural Gas Combustion	Powder Coating Booth	Abrasive Blasting	Welding	TOTAL
PM	0.54	0.13	0.816	0.01	7.6	9.10
PM10	0.54	0.13	0.816	0.01	7.6	9.10
SO2	0	0.01	0	0	0	0.01
NOx	0	1.69	0	0	0	1.69
VOC	24.05	0.09	0	0	0	24.14
CO	0	1.42	0	0	0	1.42
total HAPs	0.18	0	0	0	1.71	1.89
single HAP	0.18	0	0	0	0.39	0.57

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