



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: December 3, 2007  
RE: MM Spirit, Inc., dba American Spirit / 039-24362-00661  
FROM: Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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100 North Senate Avenue  
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## NEW SOURCE CONSTRUCTION AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**MM Spirit, Inc., dba American Spirit  
72298 SR 13 N  
Syracuse, Indiana 46567**

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

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

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

Operation Permit No.: M039-24362-00661	
Issued by:  <i>Original document signed by</i>  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 3, 2007  Expiration Date: December 3, 2012

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary equestrian trailer manufacturing operation.

Source Address:	72298 SR 13 N, Syracuse, Indiana 46567
Mailing Address:	72298 SR 13 N, Syracuse, Indiana 46567
General Source Phone Number:	(574)-457-5510
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) spray paint operation, identified as SC1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing HVLP spray and dry filters for control, exhausting to stack SCV1.
- (b) One (1) undercoating operation, identified as SC2, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing airless spray.
- (c) One (1) trailer fabrication line, identified as Line 1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing manual coating application systems.
- (d) One (1) welding and thermal cutting operation, constructed in 2005, consisting of eight (8) metal inert gas (MIG) welding stations with a maximum capacity of 8.438 pounds per hour and two (2) plasma cutting stations with a maximum cutting rate of 150 inches per minute and maximum metal thickness of 0.16".
- (e) One natural gas-fired air-make up unit, identified as AM1, constructed in 2005, with a maximum capacity of 1.25 MMBtu per hour.
- (f) Three (3) natural gas-fired infrared tube heaters, identified as H1 - H3, with a maximum capacity of 0.375 MMBtu per hour.
- (g) One (1) natural gas-fired infrared tube heater, identified as H4, with a maximum capacity of 0.060 MMBtu per hour.
- (h) One (1) natural gas-fired infrared tube heater, identified as H5, with a maximum capacity of 0.040 MMBtu per hour.
- (i) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (j) Paved and unpaved roads and parking lots with public access.

- (k) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including:
  - (1) One (1) miscellaneous metal fabrication operation, and
  - (2) One (1) abrasive blasting booth, identified as SB.

## **SECTION B GENERAL CONDITIONS**

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

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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)]**

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- (a) This permit, M039-24362-00661, 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]**

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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**

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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**

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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**

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

### **B.7 Duty to Provide Information**

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

### **B.8 Certification**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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- (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:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 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]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or

potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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(a) All terms and conditions of permits established prior to M039-24362-00661 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)]**

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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]**

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

(c) The Permittee 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**

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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]

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

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

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

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

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

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

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

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

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

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

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

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- (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]**

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three

(3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

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

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

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

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

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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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.11 Compliance Monitoring [326 IAC 2-1.1-11]**

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

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

#### **C.13 Instrument Specifications [326 IAC 2-1.1-11]**

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

### **Corrective Actions and Response Steps**

#### **C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

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

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

#### **C.15 Malfunctions Report [326 IAC 1-6-2]**

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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.16 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.17 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description

- (a) One (1) spray paint operation, identified as SC1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing HVLP spray and dry filters for control, exhausting to stack SCV1.
- (b) One (1) undercoating operation, identified as SC2, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing airless spray.
- (c) One (1) trailer fabrication line, identified as Line 1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing manual coating application systems.

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

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

#### D.1.1 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the spray paint operation SC1 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.

#### D.1.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator from SC1, SC2, or the trailer fabrication operation (Line 1).

#### D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of spray coat operation SC1, SC2, or the trailer fabrication operation (Line 1) 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.

### Compliance Determination Requirements

#### D.1.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC content limit in condition D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [ \sum (c) \times U ] / \sum U$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day less water.

Or

- (b) Compliance with the VOC content limit in Condition D.1.2 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 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.1.4(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.2.
- (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on a daily basis.
  - (3) The volume weighted average VOC content of the coatings used for each day;
  - (4) The daily cleanup solvent usage; and
  - (5) The total VOC usage for each day.
- (b) To document compliance with Condition D.1.4(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.2.
- (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
  - (3) The monthly cleanup solvent usage; and
  - (4) The total VOC usage for each month.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description

- (k) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including:
- (1) One (1) miscellaneous metal fabrication operation, and
  - (2) One (1) abrasive blasting booth, identified as SB.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the abrasive blasting booth (SB) shall not exceed 2.1 pounds per hour when operating at a process weight rate of 725 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
and P = process weight rate in tons per hour

### Compliance Determination Requirements

#### D.2.2 Particulate Control

In order to comply with condition D.2.1, the fabric filters for particulate control shall be in operation and control emissions from the abrasive blasting booth (SB) at all times that the abrasive blasting booth is in operation.

**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).

<b>Company Name:</b>	MM Spirit, Inc., dba American Spirit
<b>Address:</b>	72298 SR 13 N
<b>City:</b>	Syracuse, Indiana 46567
<b>Phone #:</b>	(574)-457-5510
<b>MSOP #:</b>	M039-24362-00661

I hereby certify that MM Spirit, Inc., dba American Spirit is  still in operation.  
 no longer in operation.

I hereby certify that MM Spirit, Inc., dba American Spirit is  in compliance with the requirements of MSOP M039-24362-00661.  
 not in compliance with the requirements of MSOP M039-24362-00661.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

### MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

**Addendum to the Technical Support Document  
for a Minor Source Operating Permit (MSOP)**

**Source Background and Description**

Source Name: MM Spirit, Inc. d/b/a American Spirit Manufacturing  
Source Location: 72298 SR 13 N, Syracuse, Indiana 46567  
County: Elkhart  
SIC Code: 3799  
Operation Permit No.: M039-24362-00661  
Permit Reviewer: ERG/TDP

On August 29, 2007, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Syracuse, Indiana, stating that MM Spirit, Inc. d/b/a American Spirit Manufacturing had applied for a Minor Source Operating Permit (MSOP) to operate a stationary equestrian trailer manufacturing operation with control. 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 September 28, 2007, MM Spirit, Inc. submitted comments on the proposed MSOP. The summary of the comments is as follows:

**Comment 1:**

Please update the Source Location Status information in Section A.1 to identify the county's current attainment status.

**Response to Comment 1:**

IDEM, OAQ agrees. The Indiana Air Pollution Control Board adopted the emergency rule for the redesignation of Elkhart County to attainment for the 8-hour ozone standard on September 6, 2007. The permit has been modified as follows:

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

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The Permittee owns and operates a stationary equestrian trailer manufacturing operation.

Source Address:	72298 SR 13 N, Syracuse, Indiana 46567
Mailing Address:	72298 SR 13 N, Syracuse, Indiana 46567
General Source Phone Number:	(574)-457-5510
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	<del>Nonattainment for 8-hour ozone standard</del> Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

**Comment 2:**

In Section A.2 (c), please remove the words "with brushes" and replace them with "systems". The trailer fabrication operation uses manual non-spray application methods.

**Response to Comment 2:**

The emission unit description has been modified as follows:

**A.2 Emission Units and Pollution Control Equipment Summary**

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

- (a) One (1) spray paint operation, identified as SC1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing HVLP spray and dry filters for control, exhausting to stack SCV1.
- (b) One (1) undercoating operation, identified as SC2, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing airless spray.
- (c) One (1) trailer fabrication line, identified as Line 1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing manual coating application ~~with brushes~~ **systems**.

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description**

- (a) One (1) spray paint operation, identified as SC1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing HVLP spray and dry filters for control, exhausting to stack SCV1.
- (b) One (1) undercoating operation, identified as SC2, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing airless spray.
- (c) One (1) trailer fabrication line, identified as Line 1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing manual coating application ~~with brushes~~ **systems**.

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

**Comment 3:**

Condition D.1.5: Please remove the words "daily" and replace with "monthly". MM Spirit feels that daily recordkeeping is burdensome.

**Response to Comment 3:**

IDEM, OAQ has conferred with the source. This source intends to use coatings compliant with the material content limits specified in 326 IAC 8-2-9. Currently, the source does not have compliant coatings. Until the source will be using compliant coatings, the source will comply with daily volume averaging and keep daily records. When the source is using all complaint coatings, the source will keep monthly records. Therefore, the permit has been modified as follows:

**D.1.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]**

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- (a)** Compliance with the VOC content limit in condition D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [ \sum (c) \times U ] / \sum U$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and  
U is the usage rate of the coating in gallons per day less water.

Or

- (b)** Compliance with the VOC content limit in Condition D.1.12 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.5 Record Keeping Requirements**

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- (a)** To document compliance with Condition ~~D.1.2~~**D.1.4(a)**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.2.

...

- (b)** To document compliance with Condition D.1.4(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.2.

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

**(2)** The amount of coating material and solvent used on a monthly basis.

**(A)** Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

**(B)** Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and

**(3)** The monthly cleanup solvent usage; and

**(4)** The total VOC usage for each month.

- ~~(b)(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

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

### Source Background and Description

<b>Source Name:</b>	MM Spirit, Inc. d/b/a American Spirit Manufacturing
<b>Source Location:</b>	72298 SR 13 N, Syracuse, Indiana 46567
<b>County:</b>	Elkhart
<b>SIC Code:</b>	3799
<b>Operation Permit No.:</b>	039-24362-00661
<b>Permit Reviewer:</b>	ERG/TDP

The Office of Air Quality (OAQ) has reviewed an application from MM Spirit, Inc. d/b/a American Spirit Manufacturing relating to the construction and operation of a stationary equestrian trailer manufacturing operation.

### Unpermitted Emission Units and Pollution Control Equipment

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

- (a) One (1) spray paint operation, identified as SC1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing HVLP spray and dry filters for control, exhausting to stack SCV1.
- (b) One (1) undercoating operation, identified as SC2, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing airless spray.
- (c) One (1) trailer fabrication line, identified as Line 1, constructed in 2005, coating metal with a maximum capacity of 0.188 trailers/hr, utilizing manual coating application with brushes.
- (d) One (1) welding and thermal cutting operation, constructed in 2005, consisting of eight (8) metal inert gas (MIG) welding stations with a maximum capacity of 8.438 pounds per hour and two (2) plasma cutting stations with a maximum cutting rate of 150 inches per minute and maximum metal thickness of 0.16".
- (e) One natural gas-fired air-make up unit, identified as AM1, constructed in 2005, with a maximum capacity of 1.25 MMBtu per hour.
- (f) Three (3) natural gas-fired infrared tube heaters, identified as H1 - H3, with a maximum capacity of 0.375 MMBtu per hour.
- (g) One (1) natural gas-fired infrared tube heater, identified as H4, with a maximum capacity of 0.060 MMBtu per hour.
- (h) One (1) natural gas-fired infrared tube heater, identified as H5, with a maximum capacity of 0.040 MMBtu per hour.
- (i) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (j) Paved and unpaved roads and parking lots with public access.

- (k) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including:
  - (1) One (1) miscellaneous metal fabrication operation, and
  - (2) One (1) abrasive blasting booth, identified as SB.

### Existing Approvals

There are no existing approvals for this source.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction and operating permit rules.

### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
SCV1	Spray Paint Operation SC1	22	2	10,000	Ambient

### Recommendation

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

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

An application for the purposes of this review was received on February 23, 2007, with additional information received on April 18, 2007.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document pages 1 through 10.

### 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	71.5
PM10	70.9
SO <sub>2</sub>	0.01
VOC	38.6
CO	0.63
NO <sub>x</sub>	0.76

HAPs	Potential to Emit (tons/yr)
Isocyanate	5.06
Ethyl Benzene	0.24
Hexane	0.25
Manganese	0.15
Other HAP	0.03
Total HAP	5.73

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM10	attainment
PM2.5	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
8-hour Ozone	nonattainment
CO	attainment
Lead	attainment

- (a) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (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 PM10, PM2.5, CO, Lead, NO<sub>2</sub> and SO<sub>2</sub>. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

### Source Status

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

Pollutant	Emissions (tons/yr)
PM	10.4
PM-10	7.11
SO <sub>2</sub>	0.01
VOC	38.6
CO	0.63
NO <sub>x</sub>	0.76
Single HAP	5.06
Combination HAPs	5.73

This new source is not a major stationary source under 326 IAC 2-2 (Prevention of Significant Deterioration) of 326 IAC 2-3 (Emission Offset) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment 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. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This is the first air approval issued to this source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this source.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M, Surface Coating of Miscellaneous Metal Parts and Products, because this source has a potential to emit of less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of combined HAP, and is not a major source of HAPs.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 20 and 40 CFR Part 63) included for this source, because this source has a potential to emit of less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of combined HAP, and is not a major source of HAPs.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-2 and 2-3 (Prevention of Significant Deterioration and Emission Offset)**

This source was constructed in 2005; no additional modifications have been made. The potential to emit of any attainment pollutant from this source is less than 250 tons per year, and the potential to emit of any nonattainment pollutant from this source is less than 100 tons per year. Therefore, this source is not subject to the requirements of 326 IAC 2-2 or 326 IAC 2-3.

#### **326 IAC 2-6 (Emission Reporting)**

This source is located in Elkhart County, is not required to operate under a Part 70 permit, and emits less than five (5) tons per year of lead. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 436 IAC 2-6-5.

#### **326 IAC 5-1 (Opacity Limitations)**

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

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

#### **326 IAC 6-4 (Fugitive Dust)**

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

#### **326 IAC 6-5 (Particulate Matter Limitations Except Lake County)**

This source is not subject to 326 IAC 6-5 (Particulate Matter Limitations Except Lake County) because the fugitive particulate matter emissions from this source are negligible.

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

This source has the potential to emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

### **State Rule Applicability – Surface Coating Operations**

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

- (a) Particulate from the spray paint operation SC1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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.

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.

- (b) The underpainting operation, identified as SC2, and the trailer fabrication operation, identified as Line 1, are not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with a potential to emit less than five-hundred fifty-one thousandths (0.551) pound per hour are exempt from this rule.

#### 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 the coating delivered to the applicator at the spray booth operation SC1, the undercoating operation SC2, and the trailer fabrication operation, identified as Line 1, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings applied to metal.

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, the spray booth is able to comply with this requirement.

### **State Rule Applicability - Welding and Cutting Operations, Metal Fabrication, and Abrasive Blasting**

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

- (a) The insignificant abrasive blasting operations are subject to 326 IAC 6-3-2 ( Particulate Emission Limitations for Manufacturing Processes) because the potential to emit from these operations is greater than five-hundred fifty-one thousandths (0.551) pound per hour.

Pursuant to 326 IAC 6-3-2, the particulate from the abrasive blasting booth shall not exceed 2.1 pounds per hour when the abrasive blasting booth (SB) is operating at a process weight rate of 725 pounds per hour.

These limits were calculated 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:

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

The fabric filters shall be in operation at all times the abrasive blasting booth (SB) is in operation, in order to comply with this limit.

- (b) The one (1) welding and thermal cutting operation, the two (2) plasma cutting stations, and the one (1) miscellaneous metal fabrication operation are not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with a potential to emit less than five-hundred fifty-one thousandths (0.551) pound per hour are exempt from this rule.

### **State Rule Applicability - Natural Gas Combustion**

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

The one (1) natural gas-fired air-make up unit, identified as AM1, the three (3) natural gas-fired infrared tube heaters, identified as H1 - H3, the one (1) natural gas-fired infrared tube heater, identified as H4, and the One (1) natural gas-fired infrared tube heater, identified as H5, are not

subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because these units are not sources of indirect heating.

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

The one (1) natural gas-fired air-make up unit, identified as AM1, the three (3) natural gas-fired infrared tube heaters, identified as H1 - H3, the one (1) natural gas-fired infrared tube heater, identified as H4, and the One (1) natural gas-fired infrared tube heater, identified as H5, are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with a potential to emit less than five-hundred fifty-one thousandths (0.551) pound per hour are exempt from this rule.

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

There are no compliance monitoring requirements included in this permit.

**Conclusion**

The construction and operation of this stationary equestrian trailer manufacturing operation shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit M039-24362-00661.

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

Company Name: **MM Spirit, Inc. d/b/a American Spirit Manufacturing**  
 Address: **72298 S.R. 13 North, Syracuse, IN 46567**  
 MSOP: **039-24362-00661**  
 Reviewer: **ERG/TDP**  
 Date: **May 7, 2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Weight % 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
<b>One (1) surface coating room, identified as SC1</b>																
Pure White Enamel IB-1535	10.7	30.8%	0.00%	30.8%	0.00%	69.2%	2.0000	0.188	3.29	3.29	1.234	29.61	5.40	3.04	4.76	75%
Off White Primer (Pt A) PG-0239	12.5	28.2%	0.00%	28.2%	0.00%	71.8%	4.0000	0.188	3.51	3.51	2.633	63.18	11.53	7.35	4.89	75%
Primer Activator (Pt B) IG-0267	8.2	42.5%	0.00%	42.5%	0.00%	57.5%	1.0000	0.188	3.50	3.50	0.656	15.75	2.87	0.97	6.09	75%
Acrylic Lacquer Thinner 5151	7.1	100.0%	25.00%	75.0%	27.00%	0.0%	0.0050	0.188	7.34	5.35	0.005	0.12	0.02	0.00	--	100%
										<b>Sub-total</b>	<b>4.52</b>	<b>109</b>	<b>19.8</b>	<b>11.4</b>		
<b>AND</b>																
<b>One (1) undercoating room, identified as SC2</b>																
DC13209 Silicone Sealant	9.93	33%	0.00%	32.5%	0.00%	67.50%	0.010	0.188	3.23	3.23	0.006	0.15	0.027	0.00	4.78	100%
81500 Auto Undercoat	7.88	45%	0.75%	44.1%	0.75%	55.90%	2.500	0.188	3.50	3.48	1.633	39.20	7.154	1.34	6.22	85%
										<b>Sub-total</b>	<b>1.64</b>	<b>39.3</b>	<b>7.18</b>	<b>1.34</b>		
<b>AND</b>																
<b>One (1) fabrication process, identified as Line 1</b>																
502LSW Lap Sealant	9.93	32%	0.00%	32.0%	0.00%	68.00%	3.160	0.188	3.18	3.18	1.888	45.31	8.268	0.00	4.67	100%
Econobond 29 Adhesive	5.76	20%	0.00%	20.0%	0.00%	80.00%	0.252	0.188	1.15	1.15	0.054	1.31	0.239	0.10	1.44	90%
Proflex 2300 Sealant	7.93	10%	0.00%	10.0%	0.00%	90.00%	0.473	0.188	0.79	0.79	0.070	1.69	0.309	0.00	0.88	100%
Mineral Spirits	6.34	100%	0.00%	100.0%	0.00%	0.00%	0.025	0.188	6.34	6.34	0.030	0.72	0.131	0.00	--	100%
Isopropyl Alcohol	6.49	100%	0.00%	100.0%	0.00%	0.00%	0.500	0.188	6.49	6.49	0.610	14.64	2.672	0.00	--	100%

**PM Control Efficiency:**

	<b>79.1%</b>				
<b>Uncontrolled</b>	<b>8.81</b>	<b>212</b>	<b>38.6</b>	<b>12.8</b>	
<b>Controlled</b>	<b>8.81</b>	<b>212</b>	<b>38.6</b>	<b>2.67</b>	

**Add worst case coating to all solvents**

**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

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Address: 72298 S.R. 13 North, Syracuse, IN 46567  
MSOP: 039-24362-00661  
Reviewer: ERG/TDP  
Date: May 7, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexane	Weight % Isocyanate Compounds	Weight % Methanol	Weight % Toluene	Weight % Xylene	Hexane Emissions (ton/yr)	Isocyanate Compounds Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>One (1) surface coating room identified as SC1</b>														
Primer Activator (Pt B)	8.2	1.0000	0.188	0.000%	75.00%	0.00%	0.00%	0.00%	0.000	5.06	0.00	0.00	0.000	5.064
Acrylic Lacquer Thinner 5151	7.10	0.0050	0.188	0.00%	0.00%	25.00%	50.00%	25.00%	0.00	0.00	0.01	0.01	0.01	0.03
<b>One (1) fabrication procdss identified as Line1</b>														
Econobond 29 Adhesive	5.8	0.2520	0.188	20.000%	0.00%	0.00%	0.00%	0.00%	0.239	0.00	0.00	0.00	0.000	0.239
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
									<b>Sub-total</b>	<b>0.24</b>	<b>5.06</b>	<b>0.01</b>	<b>0.01</b>	<b>5.332</b>
									<b>Worst Case</b>	<b>0.24</b>	<b>5.06</b>	<b>0.01</b>	<b>0.01</b>	<b>5.33</b>

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 lb

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Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.700
Grit	0.010	0.700
Steel Shot	0.004	0.860
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Black Beauty	169

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 =

725
169
99.0
0.500
0.500

Flow Rate (FR) (lb/hr) = 1238 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
1238
0.00
1.00

Uncontrolled Emissions =	12.4 lb/hr
	54.2 ton/yr
Controlled Emissions =	0.12 lb/hr
	0.54 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: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name: MM Spirit, Inc. d/b/a American Spirit Manufacturing  
Address: 72298 S.R. 13 North, Syracuse, IN 46567  
MSOP: 039-24362-00661  
Reviewer: ERG/TDP  
Date: May 7, 2007**

PROCESS	Number of Stations	Max. electrode or carbon steel consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode or carbon steel)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
<b>WELDING</b>												
Metal Inert Gas (MIG)(carbon steel)	8.00	8.438		0.0055	0.0005			0.371	0.034	0.000	0	0.034
Robotic MIG	0.00	0.000		0.0055	0.0005			0.000	0.000	0.000	0	0.000
High Frequency Welders	0.00	0.000		0.0055	0.0005			0.000	0.000	0.000	0	0.0000
<b>FLAME CUTTING</b>												
	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	
Plasma**	2.00	0.160	150.0	0.0039				0.070	0.000	0.000	0.000	0.00
Arc Carbon Cutter	0.00	0.000	10.0	0.0039				0.000	0.000	0.000	0.000	0.00
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.441	0.03	0.00	0.00	0.03
Potential Emissions lbs/day								10.6	0.81	0.00	0.00	0.81
Potential Emissions tons/year								1.93	0.15	0.00	0.00	0.15

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

An equivalence of carbon steel to pounds of weld wire consumed was assumed for spot welding. Also, a conservative assumption was made that half of the process weight rate of the welding activities (75 lbs carbon steel) is the worst case going through the spot welder.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

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 lbs.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: MM Spirit, Inc. d/b/a American Spirit Manufacturing  
Address: 72298 S.R. 13 North, Syracuse, IN 46567  
MSOP: 039-24362-00661  
Reviewer: ERG/TDP  
Date: May 7, 2007**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx 100 **see below	VOC	CO
	1.90	7.60	0.600		5.50	84.0

\*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 3;

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
One (1) Rapid Eng. Natural gas-fired Air Make-up unit, identified as AM1	1.250	10.95	0.010	0.042	0.003	0.548	0.030	0.460
Three (3) natural gas-fired infrared tube heaters, identified as H1 - H3	0.375	3.29	0.003	0.012	0.001	0.164	0.009	0.138
One (1) natural gas-fired infrared tube heaters, identified as H4	0.060	0.53	0.000	0.002	0.000	0.026	0.001	0.022
One (1) natural gas-fired furnace, identified as H5	0.040	0.35	0.000	0.001	0.000	0.018	0.001	0.015
<b>Total</b>	<b>1.73</b>	<b>15.1</b>	<b>0.01</b>	<b>0.06</b>	<b>0.005</b>	<b>0.76</b>	<b>0.04</b>	<b>0.63</b>

**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 1-03-006-0:

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

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

**Company Name: MM Spirit, Inc. d/b/a American Spirit Manufacturing**  
**Address: 72298 S.R. 13 North, Syracuse, IN 46567**  
**MSOP: 039-24362-00661**  
**Reviewer: ERG/TDP**  
**Date: May 7, 2007**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.0750	Hexane 1.8000	Toluene 0.0034
Potential Emission in tons/yr	1.59E-05	9.07E-06	5.67E-04	1.36E-02	2.57E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total HAPs
Potential Emission in tons/yr	3.78E-06	8.31E-06	1.06E-05	2.87E-06	1.59E-05	<b>0.014</b>

Methodology is the same as page 5

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

Appendix A: Emissions Calculations  
Miscellaneous Metal Fabrication

Company Name: MM Spirit, Inc. d/b/a American Spirit Manufacturing  
Address: 72298 S.R. 13 North, Syracuse, IN 46567  
MSOP: 039-24362-00661  
Reviewer: ERG/TDP  
Date: May 7, 2007

Shaping/Grinding

Process/Operation	Description	ID	Surface Thickness Removed (in)	Surface Width Removed (in)	Surface Distance (in/hr)	Material Loss (in <sup>3</sup> /hr)	Material Density (lb/in <sup>3</sup> )	Material Loss (lb/hr)
Machining/Tool/Die	Surface Grinder	Line 1	0.031	2.00	5.00	0.310	0.290	0.090
Machining/Tool/Die	Surface Grinder	Line 1	0.031	2.00	5.00	0.310	0.290	0.090
<b>Estimated Emissions (lb/hr)</b>								<b>0.18</b>
<b>Estimated Emissions (tons/yr)</b>								<b>1.09</b>

METHODOLOGY

Material Loss (in<sup>3</sup>/hr) = Surface Thickness (in) X Surface Width (in) X Surface Distance (in/hr)  
Material Density (lb/in<sup>3</sup>) = Data from O'Neal Steel, Inc. Stock List and Reference Book, 1999  
Estimated Emissions (lb/hr) = Material Loss (in<sup>3</sup>/hr) X Material Density (lb/in<sup>3</sup>)  
Estimated Emissions (tons/yr) = Material Loss (in<sup>3</sup>/hr) X 8,760 (hrs/yr) X 1/2,000 (lbs/ton)

Cutting

Process/Operation	Description	ID	Material Thickness (in)	Cutting Surface Thickness (in)	Process rate (in/hr)	Material Loss (in <sup>3</sup> /hr)	Material Density (lb/in <sup>3</sup> )	Material Loss (lb/hr)
Shearing/Cutting	Horizontal Band saw	Line 1	0.179	0.031	5.00	0.028	0.290	0.008
Shearing/Cutting	Chop Saw	Line 1	0.179	0.031	25.00	0.139	0.290	0.040
<b>Estimated Emissions (lb/hr)</b>								<b>0.05</b>
<b>Estimated Emissions (tons/yr)</b>								<b>0.21</b>

METHODOLOGY

Same as Shaping/Grinding Table

Drilling

Process/Operation	Description	ID	Material Thickness (in)	Drilling Area (in <sup>2</sup> )	Drill rate (holes/hr)	Material Loss (in <sup>3</sup> /hr)	Material Density (lb/in <sup>3</sup> )	Material Loss (lb/hr)
Machining/Tool/Die	Drill Press	Line 1	0.179	0.050	5.00	0.045	0.290	0.013
<b>Estimated Emissions (lb/hr)</b>								<b>0.01</b>
<b>Estimated Emissions (tons/yr)</b>								<b>0.06</b>

METHODOLOGY

Material Loss (in<sup>3</sup>/hr) = Material Thickness (in) X Drilling Area (in<sup>2</sup>) X Process rate (holes/hr)  
Other equations the same as above.

**Appendix A: Emissions Calculations  
Unpaved Roads**

**Company Name: MM Spirit, Inc. d/b/a American Spirit Manufacturing  
Address: 72298 S.R. 13 North, Syracuse, IN 46567  
MSOP: 039-24362-00661  
Reviewer: ERG/TDP  
Date: May 7, 2007**

<b>0.50</b>	trips/hr x
<b>0.076</b>	miles/roundtrip x

**333** miles per year

<b>Constants</b>			
where:	For PM	For PM-10	
k =	10	2.6	(particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s =	4.8	4.8	mean % silt content of unpaved roads
b =	0.5	0.4	Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c =	0.4	0.3	Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W =	15	15	tons average vehicle weight
Mdry =	0.2	0.2	surface material moisture content, % (default is 0.2 for dry conditions)
p =	125	125	number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)
<b>Particulate Emission Factor</b>			
Ef =	7.06	1.56	$Ef = \{k \cdot [(s/12)^{0.8}] \cdot [(W/3)^b] / [(Mdry/0.2)^c] \cdot [(365-p)/365]$ (lb/mile)

**PM Emissions =**  $\frac{7.06 \text{ lb/mi} \times 332.88 \text{ mi/yr}}{2000 \text{ lb/ton}}$

<b>1.18 tons/yr</b>
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**PM-10 Emissions =**  $\frac{1.56 \text{ lb/mi} \times 332.88 \text{ mi/yr}}{2000 \text{ lb/ton}}$

<b>0.26 tons/yr</b>
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The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

Company Name: MM Spirit, Inc. d/b/a American Spirit Manufacturing  
 Address: 72298 S.R. 13 North, Syracuse, IN 46567  
 MSOP: 039-24362-00661  
 Reviewer: ERG/TDP  
 Date: May 7, 2007

Uncontrolled Potential Emissions

Significant Emissions Units	PM	PM-10	SO2	NOx	VOC	CO	Lead	Ethyl Benzene	Toluene	Xylene	Benzene	Dichloro-benzene	Formal-dehyde	Hexane	Chromium	Cadmium	Manganese	Nickel	Methanol	Isocyanate	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)							
One (1) surface coating operation, identified as SC1, SC2, and Line 1	12.80	12.80	0.00	0.00	38.61	0.00	0.00	0.239	0.015	0.007	0.00	0.00	0.00	0.24	0.00	0.00	0.00	0.00	0.01	5.06	5.57
One (1) shot blast booth, identified as SB	54.2	54.2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Eight (8) MIG welding stations	1.626	1.626	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.148	0.00	0.00	0.00	0.00	0.148
Two (2) plasma cutting stations	0.307	0.307	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00000	0.00	0.00	0.00	0.00	0.00000
Natural gas-fired combustion	0.014	0.057	0.005	0.756	0.042	0.635	0.000004	0.00	0.00003	0.00	0.00002	0.00001	0.001	0.014	0.00001	0.00001	0.000003	0.00002	0.00	0.00	0.014
Miscellaneous Metal Manufacturing, including:																			0.00	0.00	
Shaping/Grinding	1.09	1.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cutting	0.211	0.493	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drilling	0.06	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	1.18	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>71.5</b>	<b>70.9</b>	<b>0.01</b>	<b>0.76</b>	<b>38.6</b>	<b>0.63</b>	<b>0.00</b>	<b>0.24</b>	<b>0.01</b>	<b>0.01</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.25</b>	<b>0.00</b>	<b>0.00</b>	<b>0.15</b>	<b>0.00</b>	<b>0.01</b>	<b>5.06</b>	<b>5.73</b>

Controlled Potential Emissions

Significant Emissions Units	PM	PM-10	SO2	NOx	VOC	CO	Lead	Ethyl Benzene	Toluene	Xylene	Benzene	Dichloro-benzene	Formal-dehyde	Hexane	Chromium	Cadmium	Manganese	Nickel	Methanol	Isocyanate	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
One (1) surface coating operation, identified as SC1, SC2, and Line 1	2.675	2.675	0.00	0.00	38.61	0.00	0.00	0.239	0.015	0.007	0.00	0.00	0.00	0.24	0.00	0.00	0.00	0.00	0.00	0.00	5.571
One (1) shot blast booth, identified as SB	0.542	0.542	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Eight (8) MIG welding stations	1.626	1.626	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.148	0.00	0.00	0.00	0.148
Two (2) plasma cutting stations	0.307	0.307	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00000	0.00	0.00	0.00	0.00	0.00000
Natural gas-fired combustion	0.014	0.057	0.005	0.756	0.042	0.635	0.000004	0.00	0.00003	0.00	0.00002	0.00001	0.001	0.014	0.00001	0.00001	0.00	0.00002	0.00	0.00	0.014
Miscellaneous Metal Manufacturing, including:																			0.00	0.00	
Shaping/Grinding	1.086	1.090	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cutting	0.211	0.493	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drilling	0.057	0.060	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	1.18	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>7.7</b>	<b>7.11</b>	<b>0.01</b>	<b>0.76</b>	<b>38.6</b>	<b>0.63</b>	<b>0.00</b>	<b>0.24</b>	<b>0.01</b>	<b>0.01</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.25</b>	<b>0.00</b>	<b>0.00</b>	<b>0.15</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>5.73</b>

Appendix A: Emissions Calculations

Company Name: MM Spirit, Inc. d/b/a American Spirit Manufacturing  
 Address: 72298 S.R. 13 North, Syracuse, IN 46567  
 MSOP: 039-24362-00661  
 Reviewer: ERG/TDP  
 Date: May 7, 2007  
 Limited Potential to Emit

Significant Emissions Units	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Lead (tons/yr)	Ethyl Benzene (tons/yr)	Toluene (tons/yr)	Xylene (tons/yr)	Benzene (tons/yr)	Dichloro- benzene (tons/yr)	Formal- dehyde (tons/yr)	Hexane (tons/yr)	Chromium (tons/yr)	Cadmium (tons/yr)	Manganese (tons/yr)	Nickel (tons/yr)	Methanol (tons/yr)	Isocyanate (tons/yr)	Total HAPs (tons/yr)	
One (1) surface coating operation, identified as SC1, SC2, and Line 1	2.675	2.675	0.000	0.000	38.61	0.000	0.000	0.239	0.015	0.007	0.00	0.00	0.00	0.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.571
One (1) shot blast booth, identified as SB	3.29	0.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Eight (8) MIG welding stations	1.626	1.626	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.148	0.00	0.00	0.00	0.00	0.148
Two (2) plasma cutting stations	0.307	0.307	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0000	0.000	0.00	0.00	0.00	0.0000
Natural gas-fired combustion	0.014	0.057	0.005	0.756	0.042	0.635	0.000004	0.00	0.00003	0.00	0.00002	0.00001	0.001	0.014	0.00001	0.00001	0.000003	0.00002	0.00	0.00	0.00	0.014
Miscellaneous Metal Manufacturing, including:																			0.00	0.00		
Shaping/Grinding	1.09	1.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cutting	0.211	0.493	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drilling	0.057	0.060	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	1.18	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>10.4</b>	<b>7.11</b>	<b>0.01</b>	<b>0.76</b>	<b>38.6</b>	<b>0.63</b>	<b>0.00</b>	<b>0.24</b>	<b>0.01</b>	<b>0.01</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.25</b>	<b>0.00</b>	<b>0.00</b>	<b>0.15</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>5.73</b>