



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: June 14, 2007
RE: All American Awards, Inc./ 023-24754-00042
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from 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-AM.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

June 14, 2007

Mr. Michael K. Lueken
All American Awards, Inc.
P.O. Box 477
Mulberry, IN 46058

Dear Mr. Lueken:

Re: Exempt Construction and Operation Status,
023-24754-00042

The application from the All American Awards, Inc., received on May 9, 2007, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following awards surface coating facility, located at 116-24 South Glick Street, Mulberry, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) spray paint booth, identified as Unit 1, installed in 1993, using low pressure air atomization spray application for coating plaques and trophies, using a maximum of 0.0034 gallons of material per hour, using dry filters for overspray control, and exhausting to the atmosphere.
- (b) One (1) spray paint booth, identified as Manual Unit 1, installed in 1993, using a maximum of twenty one (21) spray cans per week for coating plaques and trophies, using dry filters for overspray control, and exhausting to the atmosphere.

The following conditions shall be applicable:

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:

- (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.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

LQ/EVP

cc: File – Clinton County
Air Compliance – Dave Rice
Permit Tracking
Compliance Data Section

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	All American Awards, Inc.
Source Location:	116-24 South Glick Street, Mulberry, IN 46058
County:	Clinton
SIC Code:	3999
Operation Permit No.:	E023-24754-00042
Permit Reviewer:	Linda Quigley/EVP

The Office of Air Quality (OAQ) has reviewed an application from All American Awards, Inc. relating to the operation of an awards surface coating facility.

Emission Units and Pollution Control Equipment

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

- (a) One (1) spray paint booth, identified as Unit 1, installed in 1993, using low pressure air atomization spray application for coating plaques and trophies, using a maximum of 0.0034 gallons of material per hour, using dry filters for overspray control, and exhausting to the atmosphere.
- (b) One (1) spray paint booth, identified as Manual Unit 1, installed in 1993, using a maximum of twenty one (21) spray cans per week for coating plaques and trophies, using dry filters for overspray control, and exhausting to the atmosphere.

Existing Approvals

The source has no existing approvals.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Clinton County.

Pollutant	Status
PM _{2.5}	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Clinton 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 PM 2.5 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 a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Clinton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Clinton County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential To Emit (tons/year)
PM	0.09
PM-10	0.09
SO ₂	0.00
VOC	0.34
CO	0.00
NO _x	0.00
HAPs	negligible

The potential to emit (as defined in to 326 IAC 2-1.1-1(16)), of all regulated pollutants is less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

Part 70 Permit Determination

This existing 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/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 in this review.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this review.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

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

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(15), the two (2) coating lines, identified as Unit 1 and Manual Unit 1, are exempt from 326 IAC 6-3 because each coating booth uses less than five (5) gallons of material per day.

326 IAC 8-1-6 (New Facilities; General VOC Reduction Requirements)

This rule applies to facilities located anywhere in the State that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. This awards coating facility does not have a PTE VOC at 25 tons per year or more. Therefore, 326 IAC 8-1-6 does not apply.

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

The two (2) coating lines, identified as Unit 1 and Manual Unit 1, are not subject to 326 IAC 8-2-9 because potential VOC emissions are less than fifteen (15) pounds per day.

Recommendation

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

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

An application for the purposes of this review was received on May 9, 2007.

Conclusion

The operation of this awards surface coating facility shall be subject to the conditions of the attached proposed Exemption 023-24754-00042.

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

**Company Name: All American Awards, Inc.
Source Location: 116-24 South Glick Street, Mulberry, IN 46058
Exemption No.: E023-24754-00042
Reviewer: Linda Quigley
Date: June 7, 2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Unit 1 As Applied	7.5	90.00%	0.0%	90.0%	0.0%	0.00%	0.00339	6.71	6.71	0.02	0.55	0.10	0.01	n/a	50%
<i>As Supplied Coating</i>	7.7	87.00%	0.0%	87.0%	0.0%	0.00%		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<i>As Supplied Thinner</i>	7.2	100.00%	0.0%	100.0%	0.0%	0.00%		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Manual Unit 1 (spray cans)	6.2	57.03%	0.0%	57.0%	0.0%	0.00%	0.01543	3.51	3.51	0.05	1.30	0.24	0.09	n/a	50%

Potential Emissions

0.08 1.85 0.34 0.09

METHODOLOGY

Spray can usage = 21 spray cans per week; each can = 16 ounces; gal/week = 2.6
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 per hour (gal/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material per hour (gal/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material per hour (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: All American Awards, Inc.
Source Location: 116-24 South Glick Street, Mulberry, IN 46058
Exemption Number: E023-24754-00042
Permit Reviewer: Linda Quigley/EVP
Date: June 7, 2007

Material	Density (Lb/Gal)	Maximum (gal/hour)	Weight % Xylene	Weight % Toluene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)
Unit 1 As Applied	7.5	0.00339	11.00%	39.50%	1.22E-02	4.37E-02
<i>As Supplied Coating</i>	7.7					
<i>As Supplied Thinner</i>	7.2					
Manual Unit 1 (spray cans)	6.2	0.01543	0.00%	0.00%	0.00E+00	0.00E+00

Potential Emissions

0.01

0.04

METHODOLOGY

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