INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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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: September 26, 2007

RE: Becker Acroma Holding Company / 019-24987-00128

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06

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100 North Senate Avenue
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(317) 232-8603
(800) 451-6027
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New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

Becker Acroma Holdings Corporation
4720 New Middle Rd.
Jeffersonville, Indiana 47130

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F019-24987-00128	
Issued by: *Original signed by* Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 26, 2007 Expiration Date: September 26, 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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary plant manufacturing specialty coatings.

Source Address:	4720 New Middle Rd., Jeffersonville, Indiana 47130
Mailing Address:	140 Garden Avenue, Brantford, Ontario, N3T 6H2
General Source Phone Number:	(519) 756-2420
SIC Code:	2851
County Location:	Clark
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State 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

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

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

(a) Three (3) large mixing tanks, are approved for construction in 2007. The mixing tanks vent to the atmosphere through baghouse DC-1 while the solid materials are being dumped or loaded. During the mixing process the baghouse is bypassed and the tanks vent to the atmosphere through EF-1. The large mixing tank system includes:

(1) One (1) mixing tank, identified as DT01, with a maximum capacity of 6,000 liters and a maximum production rate of 131.5 gallons per hour.

(2) Two (2) mixing tanks, identified as DT02 and DT03, each with a maximum capacity of 4,000 liters and a maximum production rate of 87.7 gallons per hour.

(3) One (1) packaging and filling line exhausting through EF-3.

(b) Six (6) small mixing tanks, identified as FM01 through FM06, each tank has a maximum capacity of 1,300 liters and a maximum production rate of 42.8 gallons per hour. The small mixing tanks are approved for construction in 2007. The mixing tanks vent through baghouse DC-1 while the solid materials are being dumped or loaded. During the mixing process the tanks vent to the atmosphere through EF-2. The small mixing tank system includes one packaging and filling line exhausting through EF-4.

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

This stationary source also includes the following insignificant activities:

(a) One (1) customer demonstration center that includes:

(1) One (1) manual spray booth simulator, identified as SB-1, approved for construction in 2007, with a maximum capacity of 0.76 gallons per hour (2.876 liters per hour), and exhausting to stack SB-1. The booth uses a high volume low pressure (HVLP) spray applicator.

(2) One (1) continuous line spray booth simulator, identified as SM-1, approved for construction in 2007, with a maximum capacity of 1.89 gallons per hour (7.15 liters per hour), and exhausting to stack SM-1. The booth uses a high volume low pressure (HVLP) spray applicator.

(3) One (1) wood, plastic, and metal substrate sander meeting the definition of "insignificant grinding and machining operation" specified in 326 IAC 2-7-1(21)(G)(xxiii), approved for construction in 2007, using baghouse DC-2 as control and exhausting indoors.

(b) Natural gas-fired space heaters, identified as EU3 and EU4, approved for construction in 2007, with a combined heat input capacity of 0.38 MMBtu/hr.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and [326 IAC 2-8] when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

(a) This permit, F019-24987-00128, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

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

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

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

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

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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.14 Emergency Provisions [326 IAC 2-8-12]

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

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F019-24987-00128 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

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

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

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

B.19 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.20 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

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

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

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

B.21 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

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

B.22 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

B.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue

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

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

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

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

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

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

B.26 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit modification under326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.27 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

C.2 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 thirty percent (30%) 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.3 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.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any

monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

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

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

(e) 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.

Stratospheric Ozone Protection

C.16 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Three (3) large mixing tanks, are approved for construction in 2007. The mixing tanks vent to the atmosphere through baghouse DC-1 while the solid materials are being dumped or loaded. During the mixing process the baghouse is bypassed and the tanks vent to the atmosphere through EF-1. The large mixing tank system includes:

(1) One (1) mixing tank, identified as DT01, with a maximum capacity of 6,000 liters and a maximum production rate of 131.5 gallons per hour.

(2) Two (2) mixing tanks, identified as DT02 and DT03, each with a maximum capacity of 4,000 liters and a maximum production rate of 87.7 gallons per hour.

(3) One (1) packaging and filling line exhausting through EF-3.

(b) Six (6) small mixing tanks, identified as FM01 through FM06, each tank has a maximum capacity of 1,300 liters and a maximum production rate of 42.8 gallons per hour. The small mixing tanks are approved for construction in 2007. The mixing tanks vent through baghouse DC-1 while the solid materials are being dumped or loaded. During the mixing process the tanks vent to the atmosphere through EF-2. The small mixing tank system includes one packaging and filling line exhausting through EF-4.

Insignificant Activities

(a) One (1) customer demonstration center that includes:

(1) One (1) manual spray booth simulator, identified as SB-1, approved for construction in 2007, with a maximum capacity of 0.76 gallons per hour (2.876 liters per hour), and exhausting to stack SB-1. The booth uses a high volume low pressure (HVLP) spray applicator.

(2) One (1) continuous line spray booth simulator, identified as SM-1, approved for construction in 2007, with a maximum capacity of 1.89 gallons per hour (7.15 liters per hour), and exhausting to stack SM-1. The booth uses a high volume low pressure (HVLP) spray applicator.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8] [326 IAC 2-3]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The total VOC input to the mixing tanks (DT01, DT02, DT03, and FM01 through FM06) and their associated clean-up activities shall be limited such that the potential to emit (PTE) does not exceed 96.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The VOC loss rate for the paint production operations shall not exceed 0.015 lb/lb of solvent used. The VOC loss rates include emissions from the packaging and filling lines.

Compliance with the VOC mass input and VOC loss rate and the limits in Conditions D.1.2, D.1.3, D.1.5, and D.2.1 make the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-3 (Emission Offset) not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The input of each individual HAP to the mixing tanks (DT01, DT02, DT03, and FM01 through FM06), the surface coating operations (SB-1 and SM-1), and their associated clean-up activities shall be limited such that the potential to emit (PTE) does not exceed 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total HAP input to the mixing tanks (DT01, DT02, DT03, and FM01 through FM06), the surface coating operations (SB-1 and SM-1), and their associated clean-up activities shall be limited such that the potential to emit (PTE) does not exceed 24.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The HAP loss rate for the paint production operations shall not exceed 0.015 lb/lb of solvent used. The HAP loss rates include emissions from the packaging and filling lines.

Compliance with the single HAP and total HAP and the limits in Conditions D.1.1, D.1.3, D.1.5, and D.2.1 make the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-4.1 (Hazardous Air Pollutants) not applicable.

D.1.3 Surface Coating Emissions Limitations [326 IAC 8-2] [326 IAC 8-7] [326 IAC 2-8]

The input of VOC delivered to the applicators, including clean up solvents, in the surface coating operations (SB-1 and SM-1) shall be limited to less than fifteen (15) pounds per day, with compliance determined at the end of each day. Compliance with this limitation and the limits in D.1.1, D.1.2, D.1.5, and D.2.1 shall render the requirements of 326 IAC 8-2 (Surface Coating Emission Limitations), 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), and 326 IAC 2-7 (Part 70 Program) not applicable.

D.1.4 Particulate [326 IAC 6-3-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the following operations shall not exceed the pound per hour limits listed in the table below:

Mixer ID	Process Weight Throughput (tons/hr)	PM Emission Limit (lbs/hr)
DT01	0.55	2.74
DT02	0.37	2.09
DT03	0.37	2.09
FM01	0.18	1.29
FM02	0.18	1.29
FM03	0.18	1.29
FM04	0.18	1.29
FM05	0.18	1.29
FM06	0.18	1.29

The pounds per hour limitations were calculated with 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:

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

Compliance with these PM limits make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.5 Particulate [326 IAC 2-8] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following pound per hour limits listed in the table below:

Mixer ID	PM10 Emission Limit (lbs/hr)
DT01	2.74
DT02	2.09
DT03	2.09
FM01	1.29
FM02	1.29
FM03	1.29
FM04	1.29
FM05	1.29
FM06	1.29

Compliance with these limits and the limits in Conditions D.1.1, D.1.2, D.1.3 and D.2.1 make the requirements of 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for mixing tanks DT01, DT02, and DT03.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

(a) Compliance with the VOC and HAP content and input limitations contained in Conditions D.1.1 and 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.

(b) Compliance with Condition D.1.1 shall be determined using the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times 0.015 + M_i \times C_i$$

where:
E = VOC emissions in pounds
i = Single material

U = Usage of VOC in pounds
0.015 lb/lb = VOC loss rate in pound of VOC emissions per pound of material used
M = Usage of VOC containing cleanup material in pounds
C = VOC content in pound of VOC per pound of material

(c) Compliance with the individual HAP usage Condition D.1.2(a) shall be determined using the following equation for each individual HAP:

$$E = \sum_{i=1}^{i=n} U_i \times 0.015 + M_i \times C_i$$

where:
E = Individual HAP emissions in pounds
i = Single material
U = Usage of individual HAP in pounds
0.015 lb/lb = HAP loss rate in pound of HAP emissions per pound of material used
M = Usage of HAP containing cleanup material in pounds
C = Individual HAP content in pound of HAP per pound of material

(d) Compliance with the total HAP usage Condition D.1.2(b) shall be determined using the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times 0.015 + M_i \times C_i$$

where:
E = Total HAP emissions in pounds
i = Single material
U = Usage of total HAP in pounds
0.015 lb/lb = HAP loss rate in pound of HAP emissions per pound of material used
M = Usage of HAP containing cleanup material in pounds
C = Total HAP content in pound of HAP per pound of material

D.1.8 Particulate Control

(a) In order to comply with Conditions D.1.4 and D.1.5, individual mixing tanks (identified as DT01, DT02, DT03, and FM01 through FM06) shall vent to the atmosphere through baghouse DC-1 while solid materials are being dumped or loaded into that tank.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform testing to verify the VOC and HAP loss rate utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.

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

D.1.10 Visible Emissions Notations

(a) Daily visible emission notations of the mixing operation stack exhaust (EF-1, EF-2, and DC-1) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.11 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse (DC-1) used in conjunction with the mixing operation at least once per day while the mixing tanks are vented through the baghouse (DC-1) to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.12 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed

to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.13 Record Keeping Requirement

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(2) The amount of coating material and solvent less water used on monthly basis.

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

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

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAP input for each month; and

(5) The input of VOCs and HAP for each compliance period.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC input limits and/or the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used;

(2) The amount of coating material and solvent less water used each day.

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

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

(3) The cleanup solvent usage for each day;

(4) The total VOC input for each day; and

(5) The input of VOCs for each compliance period.

(c) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the mixing operation stack (EF-1, EF-2, and DC-1) exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(d) To document compliance with Condition D.1.11, the Permittee shall maintain daily records of the pressure drop while the mixing tanks are vented through baghouse (DC-1) to the atmosphere. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activities

(a) One (1) customer demonstration center that includes:

(3) One (1) wood, plastic, and metal substrate sander meeting the definition of "insignificant grinding and machining operation" specified in 326 IAC 2-7-1(21)(G)(xxiii), approved for construction in 2007, using baghouse DC-2 as control and exhausting indoors.

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

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

D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxiii)]

The grinding and machining operations controlled by a baghouse shall be an insignificant activity for permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxiii), including the following:

The grinding and machining baghouse (DC-2) shall not exhaust to the atmosphere greater than four thousand (4,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three one-hundredths (0.03) grain per dry standard cubic foot of outlet air.

Compliance Determination Requirements

D.2.2 Particulate Control [326 IAC 2-7-1(21)(G)(xxiii)]

(a) In order to comply with Condition D.2.1, the baghouse DC-2 for particulate control shall be in operation and control emissions from the grinding and machining at all times that the grinding and machining are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.3 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency

provisions of this permit (Section B - Emergency Provisions).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Becker Acroma Holdings Corporation
Source Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Mailing Address: 140 Garden Avenue, Brantford, Ontario, N3T 6H2
FESOP Permit No.: F019-24987-00128

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Becker Acroma Holdings Corporation
Source Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Mailing Address: 140 Garden Avenue, Brantford, Ontario, N3T 6H2
FESOP Permit No.: F019-24987-00128

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

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Becker Acroma Holdings Corporation
Source Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Mailing Address: 140 Garden Avenue, Brantford, Ontario, N3T 6H2
FESOP Permit No.: F019-24987-00128
Facility: Mixing tanks (DT01, DT02, DT03, and FM01 through FM06) and their associated clean-up activities
Parameter: VOC input
Limit: Total VOC input shall be limited such that the potential to emit (PTE) does not exceed 96.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month, based on the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times 0.015 + M_i \times C_i$$

where:
E = VOC emissions in pounds
i = Single material
U = Usage of VOC in pounds
0.015 lb/lb = VOC loss rate in pound of VOC emissions per pound of material used
M = Usage of VOC containing cleanup material in pounds
C = VOC content in pound of VOC per pound of material

YEAR:_____

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

FESOP Emission Report
(Submit Report Quarterly)

Source Name: Becker Acroma Holdings Corporation
Source Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Mailing Address: 140 Garden Avenue, Brantford, Ontario, N3T 6H2
FESOP Permit No.: F019-24987-00128
Facility: Surface coating operations (SB-1 and SM-1)
Parameter: VOC input
Limit: Total VOC input less than 15 pounds per day, with compliance determined at the end of each day.

Month: _____ **Year:** _____

Day		Day	
1		**17**	
2		**18**	
3		**19**	
4		**20**	
5		**21**	
6		**22**	
7		**23**	
8		**24**	
9		**25**	
10		**26**	
11		**27**	
12		**28**	
13		**29**	
14		**30**	
15		**31**	
16			

☐ No deviation occurred in this month.

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Becker Acroma Holdings Corporation
Source Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Mailing Address: 140 Garden Avenue, Brantford, Ontario, N3T 6H2
FESOP Permit No.: F019-24987-00128
Facility: Mixing tanks (DT01, DT02, DT03, and FM01 through FM06) and surface coating operations (SB-1 and SM-1) and their associated clean-up activities
Parameter: Each individual HAP input
Limit: Total input of each individual HAP shall be limited such that the potential to emit (PTE) does not than 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month, based on the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times 0.015 + M_i \times C_i$$

where:
E = Individual HAP emissions in pounds
i = Single material
U = Usage of individual HAP in pounds
0.015 lb/lb = HAP loss rate in pound of HAP emissions per pound of material used
M = Usage of HAP containing cleanup material in pounds
C = Individual HAP content in pound of HAP per pound of material

YEAR:_____

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

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Becker Acroma Holdings Corporation
Source Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Mailing Address: 140 Garden Avenue, Brantford, Ontario, N3T 6H2
FESOP Permit No.: F019-24987-00128
Facility: Mixing tanks (DT01, DT02, DT03, and FM01 through FM06) and surface coating operations (SB-1 and SM-1) and their associated clean-up activities
Parameter: Total HAP input
Limit: Total HAP input shall be limited such that the potential to emit (PTE) does not exceed 24.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month, based on the following equation:

$$E = \sum_{i=1}^{i=n} U_i \times 0.015 + M_i \times C_i$$

where:
E = Total HAP emissions in pounds
i = Single material
U = Usage of total HAP in pounds
0.015 lb/lb = HAP loss rate in pound of HAP emissions per pound of material used
M = Usage of HAP containing cleanup material in pounds
C = Total HAP content in pound of HAP per pound of material

YEAR:_____

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Source Name: Becker Acroma Holdings Corporation
Source Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Mailing Address: 140 Garden Avenue, Brantford, Ontario, N3T 6H2
FESOP Permit No.: F019-24987-00128

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Becker Acroma Holdings Corporation
4720 New Middle Rd.
Jeffersonville, Indiana 47130

Affidavit of Construction

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

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

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

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Becker Acroma Holdings Corporation 4720 New Middle Rd., Jeffersonville, Indiana 47130, completed construction of the specialty coatings manufacturing plant on _____in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F019-24987-00128, issued on _____.

5. ***(Permittee: Cross through this statement if it does not apply.)*** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature_____

Date_____

STATE OF INDIANA)
)SS
COUNTY OF _____)

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

My Commission expires:_____

Signature_____

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Federally Enforceable State Operating (FESOP)

Source Background and Description

Source Name:	Becker Acroma Holdings Corporation
Source Location:	4720 New Middle Rd., Jeffersonville, Indiana 47130
County:	Clark
SIC Code:	2851
Permit No.:	F019-24987-00128
Permit Reviewer:	ERG/BL

The Office of Air Quality (OAQ) has reviewed the application from Becker Acroma Holdings Corporation relating to the construction and operation of a plant manufacturing specialty coatings.

History

On July 3, 2007, Becker Acroma Holdings Corporation submitted an application to the OAQ requesting a construction and operating permit. This FESOP will be the first air approval issued to this source.

New Emission Units and Pollution Control Equipment

(a) Three (3) large mixing tanks are approved for construction in 2007. The mixing tanks vent to the atmosphere through baghouse DC-1 while the solid materials are being dumped or loaded. During the mixing process the baghouse is bypassed and the tanks vent to the atmosphere through EF-1. The large mixing tank system includes:

(1) One (1) mixing tank, identified as DT01, with a maximum capacity of 6,000 liters and a maximum production rate of 131.5 gallons per hour.

(2) Two (2) mixing tanks, identified as DT02 and DT03, each with a maximum capacity of 4,000 liters and a maximum production rate of 87.7 gallons per hour.

(3) One (1) packaging and filling line exhausting through EF-3.

(b) Six (6) small mixing tanks, identified as FM01 through FM06, each tank has a maximum capacity of 1,300 liters and a maximum production rate of 42.8 gallons per hour. The small mixing tanks are approved for construction in 2007. The mixing tanks vent through baghouse DC-1 while the solid materials are being dumped or loaded. During the mixing process the tanks vent to the atmosphere through EF-2. The small mixing tank system includes one packaging and filling line exhausting through EF-4.

Insignificant Activities

(a) One (1) customer demonstration center that includes:

(1) One (1) manual spray booth simulator, identified as SB-1, approved for construction in 2007, with a maximum capacity of 0.76 gallons per hour (2.876 liters per hour), and exhausting to stack SB-1. The booth uses a high volume low pressure (HVLP) spray applicator.

(2) One (1) continuous line spray booth simulator, identified as SM-1, approved for construction in 2007, with a maximum capacity of 1.89 gallons per hour (7.15 liters per hour), and exhausting to stack SM-1. The booth uses a high volume low pressure (HVLP) spray applicator.

(3) One (1) wood, plastic, and metal substrate sander meeting the definition of "insignificant grinding and machining operation" specified in 326 IAC 2-7-1(21)(G)(xxiii), approved for construction in 2007, using baghouse DC-2 as control and exhausting indoors.

(b) Natural gas-fired space heaters, identified as EU3 and EU4, approved for construction in 2007, with a combined heat input capacity of 0.38 MMBtu/hr.

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

Existing Approvals

There have been no previous approvals issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack / Vent ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
EF-1	Large Mixing Tanks	48.0	2.00	2,000	72.0
EF-2	Small Mixing Tanks	44.0	1.00	3,000	72.0
EF-3	Large Mixing Tanks	33.3	2.00	2,000	72.0
EF-4	Small Mixing Tanks	33.3	2.00	2,000	72.0
DC-1	Large and Small Mixing Tanks	25.0	1.50	5,900	72.0
DC-2	Customer Demonstration Center	25.0	1.00	3,000	72.0
SB-1	Customer Demonstration Center	35.6	1.50	2,000	72.0
SM-1	Customer Demonstration Center	44.0	2.00	5,400	72.0

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Clark County

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO_2	Attainment
NOx	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

(a) Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability – Entire Source section.

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

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

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	304
PM10	304
SO_2	negligible
VOC	391
CO	0.14
NO_x	0.16

HAPs	tons/year
Toluene	76.3
Total	76.3

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

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

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

	Potential To Emit (tons/year)						
Process/emission unit	**PM**	**PM-10**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
Combustion (EU3, EU4)	-	0.01	-	0.01	0.14	0.16	Single <9.40 Total <24.4
Product Blending *	10.3	10.3	-	< 96.3	-	-	
Surface Coating (SM-1, SB-1) **	0.37	0.37	-	< 2.74	-	-	
Grinding and Machining	4.51	4.51	-	-	-	-	
Total Emissions	15.2	15.2	-	< 99.0	0.14	0.16	Single <9.40 Total <24.4

* The product blending units include the following tanks: DT-01, DT-2, DT-03, and FM-01 through FM-06.
** Pursuant to 326 IAC 8-2 (Surface Coating Emissions Limitations) the surface coating operations (SB-1 and SM-1) are limited to less than fifteen (15) pounds of VOC per day.

(a) This stationary source is not major under Emission Offset because the emissions of the nonattainment pollutants, VOC, NOx, and PM10 (as surrogate for PM2.5), are less than one hundred (<100) tons per year.

(b) This stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

(a) The requirements of New Source Performance Standard (NSPS), 40 CFR 60.40c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in the permit for the natural gas-fired space heaters. This NSPS applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Each of the space heaters is not considered a steam generating unit and has a maximum design heat input capacity of less than 10 MMBtu/hr.

(b) The requirements of New Source Performance Standards (NSPS), 40 CFR 60.110b, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12), are not included in the permit. The source will not have storage tanks. Specialty coatings go directly from production to product packaging.

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

(d) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR 63, Subpart HHHHH (326 IAC 20-28) are not included in the permit for the operations at this source because this source is not a major source of HAPs. This source has elected to take a limit on single HAP and total HAP emissions of less than 10 and 25 tons per year, respectively, therefore, this rule does not apply.

(e) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63, Subpart FFFF (326 IAC 20-84) are not included in the permit for the operations at this source because this source does not manufacture the listed organic chemicals. This source only engages in mixing and blending of coatings.

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

State Rule Applicability - Entire Source

326 IAC 2-1.1(Nonattainment NSR)

Clark County has been designated as nonattainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source’s PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Becker Acroma Holdings Corporation has a potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, Nonattainment NSR does not apply.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Although the source has an SIC code of 2851, IDEM does not consider this source to have a chemical process, because there are no chemical synthesis or chemical reactions occurring in the processes. The source mixes pigments and solvents to manufacture paints. This stationary source is not one of the 28 listed source categories and is not a major source for PSD purposes because all attainment regulated pollutants less than 250 tons per year. For the specific limits, please see the FESOP limitations discussed below.

326 IAC 2-3 (Emission Offset)

Clark County has been designated as basic nonattainment for the 8-hour ozone standard. However, since the potential to emit (PTE) of VOC, has been limited to less than 100 tons per year and the PTE of NOx is less than 100 tons per year, this source is a minor source and 326 IAC 2-3 (Emission Offset) is not applicable. For the specific limits, please see the FESOP limitations discussed below.

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

This new plant has the potential to emit greater than ten (10) tons per year of a single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source accepted limits such that the emissions will be limited to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply. For the specific limit, please see the FESOP limitations discussed below.

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 County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, the regular reporting requirements of 326 IAC 2-6 do not apply. However, the source is subject to 326 IAC 2-6-5 (Additional Information Requests).

326 IAC 2-8 (FESOP Limitations)

The potential to emit is greater than ten (10) tons per year of a single HAP, greater than twenty-five (25) tons per year of a combination of HAPs, and greater than one hundred (100) tons per year of VOC. Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The total VOC input to the mixing tanks (DT01, DT02, DT03, and FM01 through FM06) and their associated clean-up activities shall be limited such that the potential to emit (PTE) does not exceed 96.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC loss rate for the paint production operations shall not exceed 0.015 lb/lb of solvent used. The VOC loss rates include emissions from the packaging and filling lines.

(b) The input of each individual HAP to the mixing tanks (DT01, DT02, DT03, and FM01 through FM06), the surface coating operations (SB-1 and SM-1), and their associated clean-up activities shall be limited such that the potential to emit (PTE) does not exceed 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The HAP loss rate for the paint production operations shall not exceed 0.015 lb/lb of solvent used. The HAP loss rates include emissions from the packaging and filling lines.

(c) The total HAP input to the mixing tanks (DT01, DT02, DT03, and FM01 through FM06), the surface coating operations (SB-1 and SM-1), and their associated clean-up activities shall be limited such that the potential to emit (PTE) does not exceed 24.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The HAP loss rate for the paint production operations shall not exceed 0.015 lb/lb of solvent used. The HAP loss rates include emissions from the packaging and filling lines.

(d) The PM10 from each of the following operations shall not exceed the pound per tons limits listed in the table below:

Mixer ID	Process Weight Throughput (tons/hr)	PM10 Emission Limit (lb/hr)
DT01	0.55	2.74
DT02	0.37	2.09
DT03	0.37	2.09
FM01	0.18	1.29
FM02	0.18	1.29
FM03	0.18	1.29
FM04	0.18	1.29
FM05	0.18	1.29
FM06	0.18	1.29

In order to comply with this limit, individual mixing tanks shall vent to the atmosphere through baghouse DC-1 while solid materials are being dumped or loaded into that tank. The control device shall be operated in accordance with manufacturer's specifications.

(e) The baghouse (DC-2) must be in operation at all times that the grinding and machining equipment is in use. For the specific limits, please see the Insignificant Activities limitations discussed below.

Compliance with these limits, combined with the VOC, PM10, and HAP emissions from all other emission units shall limit the emissions from the entire source to less than 100 tons per year for VOC, less than 100 tons per year for PM10, less than 10 tons per year for a single HAP, and less than 25 tons per year for total HAPs and render the requirements of 326 IAC 2-7 (Part 70 Program) 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-3 (Emission Offset) not applicable.

326 IAC 5-1 (Opacity Limitations)

This source is located in Jeffersonville Township in Clark County. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of thirty percent (30%) 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 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source does not have potential VOC emissions at, or in excess of 100 tons per year, and the source is approved for construction in 2007, therefore, this rule does not apply.

State Rule Applicability – Mixing Tanks, Packaging and Filling Lines

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

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter from the mixing tanks (identified as DT01, DT02, DT03, and FM01 through FM06) shall be limited by the following:

The following table sets forth the maximum process weight rate for specific emission units and the allowable rate of emissions calculated for that process weight rate.

Mixer ID	Process Weight Throughput (tons/hr)	PM Emission Limit (lb/hr)
DT01	0.55	2.74
DT02	0.37	2.09
DT03	0.37	2.09
FM01	0.18	1.29
FM02	0.18	1.29
FM03	0.18	1.29
FM04	0.18	1.29
FM05	0.18	1.29
FM06	0.18	1.29

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:

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

Emission calculations based on AP-42 Chapter 6.4 - Organic Chemical Process Industry - Paint and Varnish (May 1983 edition) indicate that each emission unit controlled by baghouse DC-1 is able to comply with the limits stated above. In order to comply with this limit, individual mixing tanks shall vent to the atmosphere through baghouse DC-1 while solid materials are being dumped or loaded into that tank. The control device shall be operated in accordance with manufacturer's specifications.

The AP-42 loss rates include particulate emissions from the packaging and filling lines. Emissions from the packaging and filling lines are uncontrolled.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

Provisions of 326 IAC 8-1-6 apply to facilities located in any county constructed after January 1, 1980, which are not otherwise regulated by any other provisions of 326 IAC 8, and have potential emissions of twenty-five (25) tons per year. The potential VOC emissions from each of the mixing tanks (identified as DT01, DT02, DT03, and FM01 through FM06) are less than twenty-five (25) tons per year. Any change that causes the potential to emit VOC from these operations to exceed twenty-five (25) tons per year must receive approval from IDEM, OAQ before such a change may occur.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This rule applies to stationary sources located in Clark County that have the potential to emit VOC at levels equal to or greater than one hundred (100) tons per year. The potential VOC emissions from the mixing tanks (identified as DT01, DT02, DT03, and FM01 through FM06) are greater than one hundred (100) tons per year. Compliance with the 326 IAC 2-8 limits the entire source emissions to less than 100 tons per year for VOC. Any change that causes the potential to emit VOC from these operations to exceed one hundred (100) tons per year must receive approval from IDEM, OAQ before such a change may occur.

State Rule Applicability – Surface Coating

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

The surface coating operations uses less than five (5) gallons of coating per day. Pursuant to 326 IAC 6-3-1(b), this manufacturing process is exempt.

326 IAC 8-1-6 (General Reduction Requirements)

The surface coating operations (SB-1 and SM-1) are not subject to this rule because the total potential to emit VOC emissions is less than 25 tons per year. The coating operations are limited to less than 10 tons per year (see 326 IAC 8-2 and 362 IAC 8-7 discussions).

326 IAC 8-2 (Surface Coating Emissions Limitations)

This rule applies to stationary sources which commence construction after July 1, 1990 and conducts surface coating to wood, plastic, and metal. This source has accepted a federally enforceable VOC emission limits on the surface coating operations (SB-1 and SM-1) of less than fifteen (15) pounds of VOC per day before add-on controls. Therefore, the requirements of this rule do not apply.

326 IAC 8-7 (Specific VOC reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This rule applies to stationary sources located in Clark County that have the potential to emit VOC at levels equal to or greater than one hundred (100) tons per year. This rule also applies to sources that have coating facilities which emit or have the potential to emit a total equal to or greater than ten (10) tons per year of VOCs in Floyd, Clark, Lake, or Porter Counties. This source has accepted a federally enforceable VOC emission limits on the surface coating operations (SB-1 and SM-1) of less than 10 tons per year. Therefore, the requirements of this rule do not apply.

State Rule Applicability – Natural Gas-Fired Space Heaters

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

The natural gas-fired space heaters (EU3 and EU4) do not produce usable heat that is transferred through a heat conducting materials barrier or by a heat storage medium to a material to be heated. As a result the space heaters are not an indirect heating unit. Therefore, 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) does not apply.

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

Natural gas-fired space heaters (EU3 and EU4) are not specifically identified in 326 IAC 6-3-2(b) through (d). Pursuant to 326 IAC 1-2-59, "Process weight; weight rate," states that liquid and gaseous fuels will not be considered as part of the process rate. Therefore, the space heaters are not subject to 326 IAC 6-3-2(e).

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This rule applies to sources emitting more than 25 tons per year or 10 pounds per hour of sulfur dioxide. The potential to emit sulfur dioxide emissions from the natural gas-fired space heaters (EU3 and EU4) are less than 25 tons per year. Therefore, the requirements of 326 IAC 7 does not apply.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

The natural gas-fired space heaters (EU3 and EU4) do not have potential VOC emissions equal to or greater than twenty five (25) tons per year. Therefore, these sources are not subject to the provisions of 326 IAC 8-1-6.

State Rule Applicability – Insignificant Grinding and Machining

326 IAC 2-7-1(21)(G)(xxiii) (Insignificant Activities)

Pursuant to 326 IAC 2-7-1(21)(G)(xxiii), the grinding and machining controlled by baghouse (identified as DC-2) shall be considered insignificant grinding and machining provided the baghouse has an outlet grain loading of less than or equal to three one-hundredths (0.03) grain per dry standard cubic feet of outlet air and the gas flow rate from the baghouse does not exceed four thousand (4,000) actual cubic feet per minute. The baghouse (DC-2) must be in operation at all times that the grinding and machining equipment is in use.

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the insignificant grinding and machining shall be limited to less than 0.551 pounds per hour when operating at a maximum process weight less than 100 pounds per hour.

Testing Requirements

The Permittee shall conduct mass balance testing for the paint production operations to demonstrate that the VOC/HAP loss rate is less than or equal to 0.015 lb/lb. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Mixing operation stack exhaust (EF-1, EF-2, and DC-1)	Water Pressure Drop	Daily	3.0 and 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

Recommendation

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

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

An application for the purposes of this review was received on July 3, 2007.

Conclusion

The operation of this plant manufacturing specialty coatings shall be subject to the conditions of the attached FESOP No. 019-24987-00128.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Combustion

Company Name: Becker Acroma Holdings Corporation
Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Permit #: F019-24987-00128
Reviewer: ERG/BL
Date: July 6, 2007

Heat Input Capacity MMBtu/hr	Potential Throughput MMSCF/yr
0.38	3.26

	Pollutant					
	PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMSCF)	1.90	7.60	0.60	100	5.50	84.0
Potential to Emit (tons/yr)	3.10E-03	0.01	9.79E-04	0.16	0.01	0.14

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.
**Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July 1998).

All emission factors are based on normal firing.

Methodology
Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
HAPs Emissions from Natural Gas Combustion
MM BTU/HR <100
Insignificant Combustion

Company Name: Becker Acroma Holdings Corporation
Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130-5839
Permit #: F019-24987-00128
Reviewer: ERG/BL
Date: July 6, 2007

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMSCF)	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03
Potential to Emit (tons/yr)	3.43E-06	1.96E-06	1.22E-04	2.94E-03	5.55E-06

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMSCF)	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential to Emit (tons/yr)	8.16E-07	1.79E-06	2.28E-06	6.20E-07	3.43E-06

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Tables 1.4-2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Emissions From Blending

Company Name: Becker Acroma Holdings Corporation
Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Permit #: F019-24987-00128
Reviewer: ERG/BL
Date: July 6, 2007

Method #1, worst case MSDS details provided by the Permittee

Mixer Tank Unit (ID)	Description	Paint Density (lbs/gallon)	Weight of VOC in Paint (lbs/gallon)	Weight of Toluene in Paint (lbs/gallon)	Weight of Solids in Paint (lbs/gallon)	Max. Production Rate (gallons/hr)	Max. Production Rate (tons/hr)	VOC Emission Factor (lbs/ton Product)	PM/PM10 Emission Factor (lbs/ton Pigment)	PTE of VOC (ton/yr)	PTE of Toluene (ton/yr)	PTE of PM/PM10 Before Control (ton/yr)
DT-01	Water Base Clear Paint Mixer	8.70	0.86	-	0.27	132	0.55	30.0	20.0	7.12	-	1.49
DT-02	Water Base Clear Paint Mixer	8.70	0.86	-	0.27	87.7	0.37	30.0	20.0	4.75	-	0.99
DT-03	Water Base Pigmented Paint Mixer	9.85	0.75	-	4.51	87.7	0.37	30.0	20.0	3.67	-	14.7
FM-01	Floor Paint Mixer	7.08	7.08	2.68	-	42.8	0.18	30.0	20.0	23.5	7.54	-
FM-02	Floor Paint Mixer	7.08	7.08	2.68	-	42.8	0.18	30.0	20.0	23.5	7.54	-
FM-03	Floor Paint Mixer	7.08	7.08	2.68	-	42.8	0.18	30.0	20.0	23.5	7.54	-
FM-04	Floor Paint Mixer	7.08	7.08	2.68	-	42.8	0.18	30.0	20.0	23.5	7.54	-
FM-05	Floor Paint Mixer	7.08	7.08	2.68	-	42.8	0.18	30.0	20.0	23.5	7.54	-
FM-06	Floor Paint Mixer	7.08	7.08	2.68	-	42.8	0.18	30.0	20.0	23.5	7.54	-
Total										**156**	**45.2**	**17.2**

Methodology
Max. Production Rate (tons/hr) = Max. Production Rate (gallons/hr) x Weight of Solids in Paint (lbs/gallon) x 1 ton/2,000 lbs
PTE of PM (ton/yr) = Max. Production Rate (tons/hr) x 8,760 hrs/yr x PM/PM10 Emission Factor (lbs/ton Pigment) x 1 ton/2,000 lbs
PTE of VOC/HAP (ton/yr) = Max. Production Rate (tons/hr) x 8,760 hrs/yr x VOC Emission Factor (lbs/ton Product) x 1 ton/2,000 lbs

Method #2, worst case assumptions: VOC content of all paint products is 100%, all products use 100% pigments, and solid content of all pigments is 100%.

Mixer Tank Unit (ID)	Description	Paint Density (lbs/gallon)	Max. Production Rate (tons/hr)	VOC Emission Factor (lbs/ton Product)	PM/PM10 Emission Factor (lbs/ton Pigment)	PTE of VOC (ton/yr)	PTE of PM/PM10 Before Control (lb/hr)	PTE of PM/PM10 Before Control (ton/yr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	PTE of PM/PM10 After Control (lbs/hr)	PTE of PM/PM10 After Control (ton/yr) *
DT-01	Water Base Clear Paint Mixer	8.34	0.55	30.0	20.0	72.1	11.0	48.0	2.74	0.55	2.40
DT-02	Water Base Clear Paint Mixer	8.34	0.37	30.0	20.0	48.1	7.32	32.0	2.09	0.37	1.60
DT-03	Water Base Pigmented Paint Mixer	8.34	0.37	30.0	20.0	48.1	7.32	32.0	2.09	0.37	1.60
FM-01	Floor Paint Mixer	8.34	0.18	30.0	20.0	23.5	3.57	15.6	1.29	0.18	0.78
FM-02	Floor Paint Mixer	8.34	0.18	30.0	20.0	23.5	3.57	15.6	1.29	0.18	0.78
FM-03	Floor Paint Mixer	8.34	0.18	30.0	20.0	23.5	3.57	15.6	1.29	0.18	0.78
FM-04	Floor Paint Mixer	8.34	0.18	30.0	20.0	23.5	3.57	15.6	1.29	0.18	0.78
FM-05	Floor Paint Mixer	8.34	0.18	30.0	20.0	23.5	3.57	15.6	1.29	0.18	0.78
FM-06	Floor Paint Mixer	8.34	0.18	30.0	20.0	23.5	3.57	15.6	1.29	0.18	0.78
Total						**309**		**206**			**10.3**

* All mixing tanks are controlled by baghouse DC-1, the assumed control efficiency is 95%.
Particulate and VOC emission factor are from AP-42, Chapter 6.4 - Organic Chemical Process Industry, Paint & Varnish, Table 6.4-1 (Publication date: May 1983).
According to AP-42 the VOC loss rate from paint products is 1.5% and the PM loss rate from pigment is 1.0%. Loss rates include emissions from the packaging and filling lines.

Methodology
Assume VOC content of all paint products is 100%, all products use 100% pigments, and solid content of all pigments is 100%.
PTE of VOC (ton/yr) =Max. Production Rate (tons/hr) x VOC loss rate (%) x 8,760 hrs/yr
PTE of PM (ton/yr) = Max. Production Rate (tons/hr) x PM loss rate (%) x 8,760 hrs/yr
326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hour) = 4.1 x process weight rate (tons/hr)^0.67

Appendix A: Emission Calculations
Emissions From Surface Coating

Company Name: Becker Acroma Holdings Corporation
Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Permit #: F019-24987-00128
Reviewer: ERG/BL
Date: July 6, 2007

Unit (ID)	Stack Vent (ID)	Description	Maximum Capacity (gallon/hr)	Worst Case Paint Density (lbs/gallon)	Weight VOC (lbs/gallon)	Weight Toluene (lbs/gallon)	Weight Solids (lbs/gallon)	PTE of VOC (ton/yr)	Production Limited VOC (ton/yr) *	PTE of Toluene (ton/yr)	PTE of PM/PM10 Before Control (ton/yr)	PTE of PM/PM10 After Control (ton/yr) *
DT-01	SB-1	Manual Spray Booth Simulator	0.76									
		Water Base Clear Paint		8.70	0.86	-	0.27	2.85		-	0.22	0.01
		Water Base Pigmented Paint		9.85	0.75	-	4.51	2.49		-	3.74	0.19
		Floor Paint		7.08	7.08	2.68	-	23.5		8.89	-	-
DT-02	SM-1	Continuous Line Spray Booth Applicator	1.89						2.74			
		Water Base Clear Paint		8.70	0.86	-	0.27	7.13		-	0.22	0.01
		Water Base Pigmented Paint		9.85	0.75	-	4.51	6.23		-	3.74	0.19
		Floor Paint		7.08	7.08	2.68	-	58.7		22.2	-	-
Total								**82.2**	**2.74**	**31.1**	**7.48**	**0.37**

All surface coating operations are controlled by baghouse DC-2; the assumed control efficiency is 95% and transfer efficiency is 75%.
* Pursuant to 326 IAC 8-2 (Surface Coating Emissions Limitations) the surface coating operations (SB-1 and SM-1) are limited to less than fifteen (15) pounds of VOC per day.

Methodology
PTE of VOC / Toluene (ton/yr) = Maximum Capacity (gallon/hr) x Weight of VOC / Toluene in Paint (lbs/gallon) x 1 ton/2,000 lbs x 8,760 hrs/yr
PTE of PM (ton/yr) = Maximum Capacity (gallon/hr) x Weight Solids (lbs/gallon) x 1 ton/2,000 lbs x 8,760 hrs/yr x (1 - Transfer Efficiency %)
Production Limited VOC (ton/yr) = Production Limited VOC (lbs/day) x 365 days/yr x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Emissions From Grinding and Machining

Company Name: Becker Acroma Holdings Corporation
Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Permit #: F019-24987-00128
Reviewer: ERG/BL
Date: July 6, 2007

Description	Maximum Flowrate (acfm)	Worst Case Particulate Loading (grains/acf)	PTE of PM/PM10, Controlled (ton/yr)	PTE of PM/PM10, Uncontrolled (ton/yr)
Insignificant Grinding	4,000	0.03	4.51	90.1

* Grinding and machining is controlled by baghouse DC-2, the assumed control efficiency is 95%.

Methodology
PTE of PM/PM10 Controlled (ton/yr) = Maximum Flowrate (acfm) x Worst Case PM Loading (grains/acf) x 1 lb/7,000 grains x 60 min/1 hr x 1 ton/2,000 lbs x 8,760 hrs/yr
PTE of PM/PM10 Uncontrolled (tons/yr) = PTE of PM/PM10 Controlled (ton/yr) / (1-Control Efficiency %)

Appendix A: Emission Calculations
Summary

Company Name: Becker Acroma Holdings Corporation
Address: 4720 New Middle Rd., Jeffersonville, Indiana 47130
Permit #: F019-24987-00128
Reviewer: ERG/BL
Date: July 6, 2007

	Potential To Emit (tons/year)							
Process/emission unit	PM	PM10	SO_2	VOC	CO	NOx	Total HAPs	Toluene
Combustion	-	0.01	-	0.01	0.14	0.16	-	-
Product Blending	206	206	-	309	-	-	45.2	45.2
Surface Coating	7.48	7.48	-	82.2	-	-	31.1	31.1
Grinding and Machining	90.1	90.1	-	-	-	-	-	-
TOTAL =	**304**	**304**	**-**	**391**	**0.14**	**0.16**	**76.3**	**76.3**

	Potential to Emit After Issuance (tons/year)							
Process/emission unit	PM	PM10	SO_2	VOC	CO	NOx	HAPs	Toluene
Combustion	-	0.01	-	0.01	0.14	0.16	24.4	9.40
Product Blending	10.3	10.3	-	96.3	-	-		
Surface Coating	0.37	0.37	-	2.74	-	-		
Grinding and Machining	4.51	4.51	-	-	-	-		
TOTAL =	**15.2**	**15.2**	**-**	**99.0**	**0.14**	**0.16**	**24.4**	**9.40**

"-" negligable