



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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Indianapolis, Indiana 46204  
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TO: Interested Parties / Applicant  
DATE: January 29, 2008  
RE: Marketing World Wide, LLC, dba Auto FX / 039-25284-00668  
FROM: Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval - Effective Immediately**

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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100 North Senate Avenue  
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## New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Marketing World Wide, LLC, dba Auto FX  
1202 Kent Street  
Elkhart, Indiana 46514**

(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.: F039-25284-00668	
Issued by:	Issuance Date: January 29, 2008
Original document signed by	Expiration Date: January 29, 2013
Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	

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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)]

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The Permittee owns and operates a stationary automobile, passenger van, and recreational vehicle painting operation.

Source Address:	1202 Kent Street, Elkhart, Indiana 46514
Mailing Address:	2212 Grand Commerce Drive, Howell, MI 48855
General Source Phone Number:	(517) 540-0045/(574) 266-0011
SIC Code:	7532
County Location:	Elkhart
Source Location Status:	Attainment for all 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)]

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

- (a) One (1) drive through spray booth for recreational vehicles (RV), identified as PB-1, utilizing HVLP application guns, utilized for metal and plastic substrate for Class A Recreational Vehicles, approved for construction in 2008, with a maximum capacity of 5.75 gallons per hour, using dry filters as particulate control, and exhausting to stack PBSV-1.
- (b) Two (2) pressurized solid back spray booths for automobiles and passenger vans, identified as PB-2 and PB-3, utilizing HVLP application guns, utilized for metal and plastic substrate only, approved for construction in 2008, each with a maximum capacity of 2.72 gallons per hour, using dry filters as particulate control, and exhausting to stacks PBSV-2 and PBSV-3.

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

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This stationary source also includes the following insignificant activities:

- (a) Three (3) indirect natural gas-fired booth heaters (one for each spray booth), identified as AM02 through AM04, approved for construction in 2008, with a combined heat input capacity of 11.07 MMBtu/hr.
- (b) One (1) indirect natural gas-fired space heater, identified as H01, approved for construction in 2008, exhausting to stack SVH01, with a heat input capacity of 0.75 MMBtu/hr.
- (c) One (1) paint preparation operations exhausted indoors.
- (d) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.

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

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

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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]

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

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

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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]

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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)]

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- (a) This permit, F039-25284-00668, 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]

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

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

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

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

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

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

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

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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)]**

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

**B.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)]**

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- (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]**

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- (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, and Northern Regional Office 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  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 F039-25284-00668 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)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least 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)]**

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(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]**

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(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)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. 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]**

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- (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]**

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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]**

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

- (a) Enter upon the Permittee's premises where a 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]**

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

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

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

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

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

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

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

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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) One (1) drive through spray booth for recreational vehicles (RV), identified as PB-1, utilizing HVLP application guns, utilized for metal and plastic substrate for Class A Recreational Vehicles, approved for construction in 2008, with a maximum capacity of 5.75 gallons per hour, using dry filters as particulate control, and exhausting to stack PBSV-1.
- (b) Two (2) pressurized solid back spray booths for automobiles and passenger vans, identified as PB-2 and PB-3, utilizing HVLP application guns, utilized for metal and plastic substrate only, approved for construction in 2008, each with a maximum capacity of 2.72 gallons per hour, using dry filters as particulate control, and exhausting to stacks PBSV-2 and PBSV-3.

(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 FESOP Limits [326 IAC 2-8]

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

- (a) The total VOC input to the surface coating operations (PB-1, PB-2, and PB-3), their associated clean-up activities, and paint preparation shall not exceed 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The input of individual HAP to the surface coating operations (PB-1, PB-2, and PB-3), their associated clean-up activities, and paint preparation shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total HAP input to surface coating operations (PB-1, PB-2, and PB-3), their associated clean-up activities, and paint preparation shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits will limit the source wide VOC, individual HAP, and total HAP emissions to less than 100, 10, and 25 tons per year, respectively, and render 326 IAC 2-7 (Part 70) not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the VOC input to the surface coating operation (PB-1) while painting predominantly plastic substrates shall be less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

In order to render the requirements of 326 IAC 8-2-9 not applicable to metal surface coating spray booths (PB-1, PB-2, and PB-3), the Permittee shall limit the source-wide production of customized top coating on predominantly metal substrates in spray booths (PB-1, PB-2, and PB-3) to less than thirty-five (35) vehicles per day.

**D.1.4 Particulate [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), particulate from each of the paint booths shall be controlled by a dry particulate filter, water wash or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.5 Preventive Maintenance Plan**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the surface coating operations (PB-1, PB-2, and PB-3) and their dry filters.

**Compliance Determination Requirements**

**D.1.6 Volatile Organic Compounds (VOC) Emissions Determination**

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Compliance with Conditions D.1.1 and D.1.2 shall be determined by calculating the VOC emissions associated with surface coating operations (PB-1, PB-2, and PB-3) using the following equation:

$$VOC = \sum CU \times D \times W\%V \times 1 / 2000$$

where:

VOC = Total VOC emissions (tons/month) for all coatings.

CU = Total coating use (gallons/month) of each coating.

D = Density (pounds coating/gallon coating) of each coating.

W%V = Weight percent VOC (pounds VOC/pounds coating) of each coating.

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

**D.1.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

**D.1.8 Record Keeping Requirements**

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- (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 HAP and VOC usage limits and/or the VOC emission 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 HAP and VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total HAP and VOC usage for each month; and
  - (5) The weight of HAP and VOCs emitted for each month.
- (b) In order to document compliance with Condition D.1.3, the Permittee shall keep daily records of the number of vehicles that receive customized top coating in each booth, PB-1, PB-2, and PB-3.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

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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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Marketing World Wide, LLC, dba Auto FX  
Source Address: 1202 Kent Street, Elkhart, Indiana 46514  
Mailing Address: 2212 Grand Commerce Drive, Howell, MI 48855  
FESOP Permit No.: F039-25284-00668

**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: Marketing World Wide, LLC, dba Auto FX  
Source Address: 1202 Kent Street, Elkhart, Indiana 46514  
Mailing Address: 2212 Grand Commerce Drive, Howell, MI 48855  
FESOP Permit No.: F039-25284-00668

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul> |
|---|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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 Usage Report**  
(Submit Report Quarterly)

Source Name: Marketing World Wide, LLC, dba Auto FX  
Source Address: 1202 Kent Street, Elkhart, Indiana 46514  
Mailing Address: 2212 Grand Commerce Drive, Howell, MI 48855  
FESOP Permit No.: F039-25284-00668  
Facility: Surface coating operation (PB-1, PB2, and PB3)  
Parameter: Production of customized top coating of automobiles and trucks  
Limit: The Permittee shall limit the production of customized top coating of automobiles and trucks to less than thirty-five (35) vehicles per 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 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: Marketing World Wide, LLC, dba Auto FX  
Source Address: 1202 Kent Street, Elkhart, Indiana 46514  
Mailing Address: 2212 Grand Commerce Drive, Howell, MI 48855  
FESOP Permit No.: F039-25284-00668  
Facility: Surface coating operations (PB-1, PB-2, and PB-3)  
Parameter: VOC input  
Limit: The total VOC input to the surface coating operations (PB-1, PB-2, and PB-3), their associated clean-up activities, and paint preparation shall not exceed 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	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: Marketing World Wide, LLC, dba Auto FX  
Source Address: 1202 Kent Street, Elkhart, Indiana 46514  
Mailing Address: 2212 Grand Commerce Drive, Howell, MI 48855  
FESOP Permit No.: F039-25284-00668  
Facility: Surface coating operations (PB-1, PB-2, and PB-3)  
Parameter: Individual HAP input  
Limit: The input of individual HAP to the surface coating operations (PB-1, PB-2, and PB-3), their associated clean-up activities, and paint preparation shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	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: Marketing World Wide, LLC, dba Auto FX  
Source Address: 1202 Kent Street, Elkhart, Indiana 46514  
Mailing Address: 2212 Grand Commerce Drive, Howell, MI 48855  
FESOP Permit No.: F039-25284-00668  
Facility: Surface coating operations (PB-1, PB-2, and PB-3)  
Parameter: Total HAP input  
Limit: The total HAP input to surface coating operations (PB-1, PB-2, and PB-3), their associated clean-up activities, and paint preparation shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	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: Marketing World Wide, LLC, dba Auto FX  
Source Address: 1202 Kent Street, Elkhart, Indiana 46514  
Mailing Address: 2212 Grand Commerce Drive, Howell, MI 48855  
FESOP Permit No.: F039-25284-00668  
Facility: Surface coating operation (PB-1)  
Parameter: VOC input  
Limit: The VOC input to the surface coating operation (PB-1) while painting plastic shall be less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	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: Marketing World Wide, LLC, dba Auto FX  
 Source Address: 1202 Kent Street, Elkhart, Indiana 46514  
 Mailing Address: 2212 Grand Commerce Drive, Howell, MI 48855  
 FESOP Permit No.: F039-25284-00668

**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 ΔNo deviations occurred this reporting period@.	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

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

Marketing World Wide, LLC, dba Auto FX  
1202 Kent Street  
Elkhart, Indiana 46514

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 Marketing World Wide, LLC, dba Auto FX 1202 Kent Street, Elkhart, Indiana 46514, completed construction of the automobile and recreational vehicle painting operation on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 14, 2007 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F039-25284-00668, Plant ID No. 039-00668 issued on \_\_\_\_\_.
5. **Note to the Permittee: Strikethrough this paragraph 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 Permit**

**Source Background and Description**

Source Name:	Marketing World Wide, LLC, dba Auto FX
Source Location:	1202 Kent Street, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	7532
Permit No.:	039-25284-00668
Permit Reviewer:	ERG/BL

The Office of Air Quality (OAQ) has reviewed the operating permit application from Marketing World Wide, LLC, dba Auto FX relating to the operation of an automobile, passenger van, and recreational vehicle painting operation.

**History**

On September 14, 2007, Marketing World Wide, LLC, dba Auto FX submitted applications to the OAQ requesting a FESOP.

**New Emission Units and Pollution Control Equipment**

- (a) One (1) drive through spray booth for recreational vehicles (RV), identified as PB-1, utilizing HVLP application guns, utilized for metal and plastic substrate for customized top coating of Class A Recreational Vehicles, approved for construction in 2008, with a maximum capacity of 5.75 gallons per hour, using dry filters as particulate control, and exhausting to stack PBSV-1.
- (b) Two (2) pressurized solid back spray booths for customized top coating of automobiles and passenger vans, identified as PB-2 and PB-3, utilizing HVLP application guns, utilized for metal and plastic substrate, approved for construction in 2008, each with a maximum capacity of 2.72 gallons per hour, using dry filters as particulate control, and exhausting to stacks PBSV-2 and PBSV-3.

**Insignificant Activities**

- (a) Three (3) indirect natural gas-fired booth heaters (one for each spray booth), identified as AM02 through AM04, approved for construction in 2008, with a combined heat input capacity of 11.07 MMBtu/hr.
- (b) One (1) indirect natural gas-fired space heater, identified as H01, approved for construction in 2008, exhausting to stack SVH01, with a heat input capacity of 0.75 MMBtu/hr.
- (c) One (1) paint preparation operations exhausted indoors.
- (d) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.
- (e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

### Existing Approvals

There are no previous approvals for this source.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
PBSV-1	spray booth PB-1	26.0	3.00	32,000	ambient
PBSV-2	spray booth PB-2	26.0	3.00	17,000	ambient
PBSV-3	spray booth PB-3	26.0	3.00	17,000	ambient
SVH01	space heater H01	24.0	0.33	ambient	ambient

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Elkhart County

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

- (a) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO, and lead. Therefore, these emissions were reviewed pursuant to the

requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	29.4
PM10	29.7
SO <sub>2</sub>	0.03
VOC	284
CO	4.26
NO <sub>x</sub>	5.08

HAPs	tons/year
Ethyl Benzene	13.3
Isocyanate	33.3
Toluene	28.8
Xylene	71.1
Total	147

- (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 PM10 and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP and New Source Construction under 326 IAC 2-5.1-3.
- (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 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 greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below the Title V emission thresholds. Therefore, the source will be issued a FESOP
- (d) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### Potential to Emit After Issuance

The source is a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance

of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						HAPs**
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	
NG combustion (H01, AM02 through AM04)	0.10	0.39	0.03	0.28	4.26	5.08	0.10
Surface Coating (PB-1)*	0.69	0.69	-	<99.0	-	-	Single: <9.9 Total: <24.9
Surface Coating (PB-2)*	0.29	0.29	-		-	-	
Surface Coating (PB-3)*	0.29	0.29	-		-	-	
Paint Preparation	3.81	3.85	-		-	-	
Total Emissions	5.18	5.47	0.03	<99.28	4.26	5.08	Single: <10 Total: <25

\* In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall limit the total VOC input to the surface coating operations (PB-1, PB-2, and PB-3) to less than 94 tons per year. In order to render the requirements of 326 IAC 8-1-6 (BACT) and not applicable, the Permittee shall limit the VOC input while painting plastic to less than 25 tons per year.

\*\* The input of individual HAP to the surface coating operations (PB-1, PB-2, and PB-3) and their associated clean-up activities are limited to less than 9.90 tons per twelve (12) consecutive month period. The total combined HAP input to the surface coating operations (PB-1, PB-2, and PB-3) and their associated clean-up activities are limited to less than 24.9 tons per twelve (12) consecutive month period.

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

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The requirements of the New Source Performance Standard (NSPS) for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12) are not included in this permit. 40 CFR 60, Subpart MM applies to prime, guide, and topcoat painting operations located at an automobile or light duty truck assembly plant. This source does not operate an automobile or light duty trucks assembly plant.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Miscellaneous Metal Parts and Products Surface Coating, 40 CFR 63, Subpart MMMM (326 IAC 20-80) are not included in the permit for the surface coating operations (PB-1, PB-2, and PB-3). This source is not a major source of HAPs because the source has accepted federally enforceable limits such that HAP emissions from the entire source are limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for total combined HAPs.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81) are not included in the permit for the surface coating operations (PB-1, PB-2, and PB-3). This source is not a major source of HAPs because the source has accepted federally enforceable limits such that HAP emissions from the entire source are limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for total combined HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85) are not included in the permit for the surface coating operations (PB-1, PB-2, and PB-3). This source is not a major source of HAPs because the source has accepted federally enforceable limits such that HAP emissions from the entire source are limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for total combined HAPs.

### **State Rule Applicability - Entire Source**

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

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, fugitive emissions are not counted towards applicability of PSD.

The source has the unrestricted potential to emit VOC emissions greater than 250 tons per year. The source has accepted limitations to ensure VOC emissions are less than 250 tons per year. For the specific limit, please see the FESOP limitations discussed below.

Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) are not applicable and this source is a minor source under 326 IAC 2-2.

#### **326 IAC 2-3 (Emission Offset)**

Elkhart County was designated in attainment by U.S. EPA effective July 19, 2007. The designation was incorporated into 326 IAC 1-4-1 by a 90 day emergency rule effective September 6, 2007. This emergency rule will expire on December 5, 2007 but is expected to be readopted by the APCB and remain in effect until the effective date of regular rulemaking.

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

The source has the unrestricted potential to emit a single HAP greater than ten (10) tons per year and the potential to emit a combination of HAPs greater than twenty-five (25) tons per year. However, the source has accepted limits on HAP usage that will make the source a minor source under Section 112 of the Clean Air Act. For the specific limit, please see the FESOP limitations discussed below. Therefore, 326 IAC 2-4.1 does not apply.

#### **326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP))**

The source has the unrestricted potential to emit (PTE) of VOC greater than 100 tons per year, the unrestricted PTE of a single HAP greater than ten (10) tons per year, and the PTE of a combination of HAPs greater than twenty-five (25) tons per year.

The source has accepted the following limitations to ensure VOC, single HAP, and a combination of HAPs are less than 100, 10, and 25 tons per year, respectively:

- (a) The total VOC input to the surface coating operations (PB-1, PB-2, and PB-3), their associated clean-up activities, and paint preparation shall not exceed 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The input of individual HAP to the surface coating operations (PB-1, PB-2, and PB-3), their associated clean-up activities, and paint preparation shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total HAP input to surface coating operations (PB-1, PB-2, and PB-3), their associated clean-up activities, and paint preparation shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits will limit source-wide VOC, individual HAP, and total HAP emissions to less than 100, 10, and 25 tons per year, respectively, and render 326 IAC 2-7 (Part 70) not applicable.

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

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

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

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

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

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

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

#### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in Elkhart County. This source is not located in any of the areas listed in 326 IAC 6-5-1(a). Therefore, this source is not subject to the requirements of 326 IAC 6-5. This source did not receive all of the necessary preconstruction approvals prior to December 13, 1985. However, the fugitive particulate emissions from the unpaved roads are negligible. Pursuant to 326 IAC 6-5-7(d), this source is not subject to the requirements of 326 IAC 6-5.

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

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

Pursuant to 326 IAC 6-3-2(d), the surface coating operations (PB-1, PB-2, and PB-3) shall use dry filters for particulate control at all times the surface coating booths are in operation. The control device shall be operated in accordance with manufacturer's specifications.

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

The surface coating operations, PB-1, PB-2, and PB-3 each paint metal and plastic. Although the operations are subject to 326 IAC 8-2-9 while painting metal (see further below), these booths also paint plastic surfaces and were constructed after January 1, 1980. Therefore, the booths must be evaluated under 326 IAC 8-1-6 while painting plastic.

- (a) The potential VOC emissions of PB-1 before controls are greater than 25 tons per year while painting plastic. In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the VOC input to the surface coating operation (PB-1) shall be less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The potential VOC emissions of PB-2 and PB-3 before controls are each less than 25 tons per year while painting plastic. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

#### 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

This source paints automobiles, passenger vans, and recreational vehicles. However, the operations are not assembly plants and are therefore not subject to 326 IAC 8-2-2.

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

The surface coating operations, PB-1, PB-2, and PB-3 coat metal parts and have actual emissions greater than 15 lbs per day; therefore PB-1, PB-2 and PB-3 are subject to 326 IAC 8-2-9. Since the booths only do customized top coatings, in order to render the requirements of 326 IAC 8-2-9 not applicable to metal surface coating spray booths (PB-1, PB-2, and PB-3), the Permittee shall limit the source-wide production of customized top coating on spray booths (PB-1, PB-2, and PB-3) to less than thirty-five (35) vehicles per day.

#### 326 IAC 8-10 (Automobile Refinishing)

The surface coating operations (PB-1, PB-2, and PB-3) are not subject to 326 IAC 8-10 because they are located in Elkhart County. 326 IAC 8-10 only applies to auto refinishing facilities located in Clark, Lake, Floyd, or Porter counties.

### **State Rule Applicability – Natural Gas Fired Combustion Sources**

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

The natural gas-fired booth heaters (AM02 through AM04) and space heater (H01) 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. These heaters are not indirect heating units. Therefore, 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) does not apply.

### **Testing Requirements**

No stack test is required in this FESOP permit because compliance with the VOC and HAP emission limits are demonstrated by Material Safety Data Sheets or Certified Product Data Sheets and records of the amount of each coating and solvent applied.

### **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:

<b>Control</b>	<b>Parameter</b>	<b>Frequency</b>	<b>Range</b>	<b>Excursions and Exceedances</b>
Water Wash and Dry Filters	Verify Operation	Daily	Normal-Abnormal	Response Steps
Coating Booth Stacks (PBSV-1, PBSV-2, and PBSV-3)	Verify Water Level or Overspray Operation	Weekly	Normal-Abnormal	Response Steps
	Inspect Overspray	Monthly	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

### **Recommendation**

The staff recommends to the Commissioner that the New Source Construction and 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 September 14, 2007.

### **Conclusion**

The construction and operation of this automobile, passenger vans, and recreational vehicle painting operation shall be subject to the conditions of the attached New Source Construction and FESOP No. 039-25284-00668.

**Appendix A: Emission Calculations  
Summary**

**Company Name:** Marketing World Wide, LLC, dba Auto FX  
**Address City IN Zip:** 1202 Kent Street, Elkhart, Indiana 46514  
**FESOP:** 039-25284-00668  
**Reviewer:** ERG/BL  
**Date:** November 2, 2007

Process/emission unit	Potential To Emit (tons/year)										
	PM	PM10	SO2	NOx	VOC	CO	Ethyl Benzene	Isocyanate	Toluene	Xylene	Combined HAP
Natural Gas Combustion (H01, AM02 through AM04)	0.10	0.39	0.03	5.08	0.28	4.26	-	-	-	-	0.10
Surface Coating (PB-1)	13.8	13.8	-	-	140	-	6.58	17.0	17.3	35.0	75.8
Surface Coating (PB-2)	5.89	5.89	-	-	68.8	-	3.38	8.1	5.8	18.4	35.7
Surface Coating (PB-3)	5.89	5.89	-	-	68.8	-	3.38	8.1	5.8	18.4	35.7
Paint Preparation	3.81	3.81	-	-	5.71	-	-	-	-	-	-
<b>TOTALS</b>	<b>29.4</b>	<b>29.7</b>	<b>0.03</b>	<b>5.08</b>	<b>284</b>	<b>4.26</b>	<b>13.3</b>	<b>33.3</b>	<b>28.8</b>	<b>71.7</b>	<b>147</b>

Process/emission unit	Potential to Emit After Issuance (tons/year)										
	PM	PM10	SO2	NOx	VOC	CO	Ethyl Benzene**	Isocyanate**	Toluene**	Xylene**	Combined HAP**
Natural Gas Combustion (H01, AM02 through AM04)	0.10	0.39	0.03	5.08	0.28	4.26	-	-	-	-	0.10
Surface Coating (PB-1)*	0.69	0.69	-	-	99.0	-	9.00	9.00	9.00	9.90	24.9
Surface Coating (PB-2)*	0.29	0.29	-	-		-					
Surface Coating (PB-3)*	0.29	0.29	-	-		-					
Paint Preparation	3.81	3.81	-	-	-	-	-	-	-	-	-
<b>TOTALS</b>	<b>5.18</b>	<b>5.47</b>	<b>0.03</b>	<b>5.08</b>	<b>99.28</b>	<b>4.26</b>	<b>9.00</b>	<b>9.00</b>	<b>9.00</b>	<b>9.90</b>	<b>25.0</b>

\* In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall limit the VOC input to the surface coating operations (PB-1, PB-2, and PB-3) to less than 94 tons per year. In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the Permittee shall limit the VOC input while painting plastic to less than 25 tons per year.

\*\* The input of individual HAP to the surface coating operations (PB-1, PB-2, and PB-3) and their associated clean-up activities are limited to less than 9.00 tons per twelve (12) consecutive month period. The total combined HAP input to the surface coating operations (PB-1, PB-2, and PB-3) and their associated clean-up activities are limited to less than 24.0 tons per twelve (12) consecutive month period.

**Appendix A: Emissions Calculations**

**Natural Gas**

**Space Heater (H01) and Booth Heaters (AM02 through AM04)**

**Company Name:** Marketing World Wide, LLC, dba Auto FX  
**Address City IN Zip:** 1202 Kent Street, Elkhart, Indiana 46514  
**FESOP:** 039-25284-00668  
**Reviewer:** ERG/BL  
**Date:** November 2, 2007

Heat Input (MMBtu/hr)	Unit
0.75	Space Heater (H01)
4.32	Booth Heaters (AM02)
6.75	Booth Heaters (AM03 and AM04)

Total Heat Input Capacity  
MMBtu/hr  
11.8

Potential Throughput  
MMCF/yr  
102

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.60	100.0 **see below	5.5	84.0
Potential to Emit in tons/yr	0.10	0.39	0.03	5.08	0.28	4.26

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

\*\*Emission Factors for NOx (Uncontrolled) = 100 lb/MMCF

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. [7/98]

**Methodology**

Potential Throughput (MMCF/yr) = Total Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2,000 lbs

See page 3 for HAP emissions calculations.

**Appendix A: HAP Emissions Calculations**  
**Natural Gas**  
**Boilers (#2 and #3)**

**Company Name:** Marketing World Wide, LLC, dba Auto FX  
**Address City IN Zip:** 1202 Kent Street, Elkhart, Indiana 46514  
**FESOP:** 039-25284-00668  
**Reviewer:** ERG/BL  
**Date:** November 2, 2007

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential to Emit in tons/yr	1.07E-04	6.09E-05	3.81E-03	9.14E-02	1.73E-04

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential to Emit in tons/yr	2.54E-05	5.58E-05	7.11E-05	1.93E-05	1.07E-04

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations  
VOC and Particulate  
RV Surface Coating Booth (PB-1)**

**Company Name:** Marketing World Wide, LLC, dba Auto FX  
**Address City IN Zip:** 1202 Kent Street, Elkhart, Indiana 46514  
**FESOP:** 039-25284-00668  
**Reviewer:** ERG/BL  
**Date:** November 2, 2007

Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Weight % Non Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Material Usage (lbs/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Uncontrolled PTE of PM/PM10 (tons/yr)	**Transfer Efficiency	Controlled PTE of PM/PM10 (lbs/hr)	Controlled PTE of PM/PM10 (tons/yr)																																			
<b>Basecoat Application - Step 1</b>																																																					
BCS-605 Reducer	7.24	100%	0%	100%	0%	0.00%	3.00	0.50	10.9	7.24	7.24	10.9	261	47.6	0	75%	0	0																																			
Basecoat U7002	7.78	78.8%	0%	78.8%	0%	21.2%	3.00	0.50	11.7	6.13	6.13	9.19	221	40.3	2.71	75%	0.03	0.14																																			
<b>Clearcoat Application - Step 2</b>											<b>Totals for Step 1</b>																																										
Clearcoat CC650	8.02	57.8%	0%	57.8%	0%	45.0%	3.67	0.50	14.7	4.64	4.64	8.51	204	37.3	6.80	75%	0.08	0.34																																			
CCH690 Hardener	8.71	33.0%	0%	33.0%	0%	67.0%	1.33	0.50	5.79	2.87	2.87	1.91	45.8	8.36	4.25	75%	0.05	0.21																																			
<b>Cleaning Solvent</b>											<b>Totals for Step 2</b>																																										
P-1208 Precleaner (Unit Cleaner)	6.37	100%	0%	100%	0%	0%	0.25	0.50	0.80	6.37	6.37	0.80	19.1	3.48	0	100%	0	0																																			
Denatured Alcohol	6.79	95.0%	5.00%	90.0%	4.08%	0%	0.25	0.50	0.85	6.37	6.11	0.76	18.3	3.34	0	100%	0	0																																			
												<b>32.0</b>							<b>769</b>							<b>140</b>							<b>13.8</b>							<b>0.16</b>							<b>0.69</b>						

\*\* Coating applied using high volume, low pressure (HVLP) spray application and manual (hand wiping) cleaning. Overspray controlled by dry filters.

**METHODOLOGY**

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

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

Pounds VOC per Gallon of Solids = [Density (lb/gal) \* Weight % Organics] / (Volume % Solids)

PTE of VOC (lbs/hr) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

PTE of VOC (lbs/day) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* 8,760 hr/yr \* 1 ton/2,000 lbs

Uncontrolled PTE of PM/PM10 (tons/yr) = Maximum (units/hr) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* 8,760 hours/year \* 1 ton/2,000 lbs \* (1-Transfer efficiency)

Controlled PTE of PM/PM10 (lbs/hr) = Maximum (units/hr) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (1-Control efficiency)

Controlled PTE of PM/PM10 (tons/yr) = Max. (units/hr) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (1-Control efficiency) \* 8,760 hours/year \* 1 ton/2,000 lbs

**HAZARDOUS AIR POLLUTANTS**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hr)	Weight % Ethyl Benzene	Weight % Isocyanate	Weight % Toluene	Weight % Xylene	PTE of Ethyl Benzene (tons/yr)	PTE of Isocyanate (tons/yr)	PTE of Toluene (tons/yr)	PTE of Xylene (tons/yr)	PTE of Total HAP (tons/yr)																				
<b>Basecoat Application - Step 1</b>																																
BCS-605 Reducer	7.24	3.00	0.50	9.00%	0%	0%	51.0%	4.28	0	0	24.3	28.5																				
Basecoat U7002	7.78	3.00	0.50	0%	0%	0%	0%	0	0	0	0	0																				
<b>Clearcoat Application - Step 2</b>								<b>Totals for Step 1</b>																								
Clearcoat CC650	8.02	3.67	0.50	2.00%	0%	26.0%	8.00%	1.29	0	16.8	5.16	23.2																				
CCH690 Hardener	8.71	1.33	0.50	4.00%	67.0%	0%	22.0%	1.01	17.0	0	5.58	23.6																				
<b>Cleaning Solvent</b>								<b>Totals for Step 2</b>																								
P-1208 Precleaner (Unit Cleaner)	6.37	0.25	0.50	0%	0%	14.5%	0%	0	0	0.51	0	0.51																				
Denatured Alcohol	6.79	0.25	0.50	0%	0%	0%	0%	0	0	0	0	0																				
<b>Total</b>								<b>6.58</b>					<b>17.0</b>					<b>17.3</b>					<b>35.0</b>					<b>75.8</b>				

Methyl isobutyl ketone (MIBK)

**METHODOLOGY**

PTE of HAPS (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8,760 hrs/yr \* 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
VOC and Particulate  
Van Surface Coating Process (PB-2)**

**Company Name:** Marketing World Wide, LLC, dba Auto FX  
**Address City IN Zip:** 1202 Kent Street, Elkhart, Indiana 46514  
**FESOP:** 039-25284-00668  
**Reviewer:** ERG/BL  
**Date:** November 2, 2007

Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Material Usage (lbs/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC* (tons/yr)	Uncontrolled PTE of PM/PM10 (tons/yr)	**Transfer Efficiency	Controlled PTE of PM/PM10 (lbs/hr)	Controlled PTE of PM/PM10 (tons/yr)	
<b>Basecoat Application - Step 1</b>																			
BCS-605 Reducer	7.24	100%	0%	100%	0%	0%	0.69	1.25	6.24	7.24	7.24	6.24	150	27.3	0	75%	0	0	
Basecoat U7002	7.78	78.8%	0%	78.8%	0%	21.2%	0.69	1.25	6.71	6.13	6.13	5.29	127	23.2	1.56	75%	0.02	0.08	
<b>Clearcoat Application - Step 2</b>												<b>Totals for Step 1</b>	<b>11.5</b>	<b>277</b>	<b>50.5</b>	<b>1.56</b>		<b>0.02</b>	<b>0.08</b>
Clearcoat CC650	8.02	57.8%	0%	57.8%	0%	45.0%	0.50	1.25	4.96	4.64	4.64	2.87	68.8	12.6	2.29	75%	0.03	0.11	
CCH690 Hardener	8.71	33.0%	0%	33.0%	0%	67.0%	0.26	1.25	2.78	2.87	2.87	0.91	22.0	4.01	2.04	75%	0.02	0.10	
<b>Cleaning Solvent</b>												<b>Totals for Step 2</b>	<b>3.78</b>	<b>90.8</b>	<b>16.6</b>	<b>4.33</b>		<b>0.05</b>	<b>0.22</b>
P-1208 Precleaner (Unit Cleaner)	6.37	100%	0%	100%	0%	0%	0.02	1.25	0.20	6.37	6.37	0.20	4.77	0.87	0	100%	0	0	
Denatured Alcohol	6.79	95.0%	5.00%	90.0%	4.08%	0%	0.02	1.25	0.21	6.37	6.11	0.19	4.58	0.84	0	100%	0	0	
												<b>15.7</b>	<b>377</b>	<b>68.8</b>	<b>5.89</b>		<b>0.07</b>	<b>0.29</b>	

\* The source says that 10% (6.88 tpy) of the VOC emissions from PB-2 are attributed to painting plastic, and 90% (61.9 tpy) attributed to painting metal.

\*\* Coating applied using high volume, low pressure (HVLP) spray application and manual (hand wiping) cleaning. Overspray controlled by dry filters.

**METHODOLOGY**

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

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

Pounds VOC per Gallon of Solids = [Density (lb/gal) \* Weight % Organics] / (Volume % Solids)

PTE of VOC (lbs/hr) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

PTE of VOC (lbs/day) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* 8,760 hr/yr \* 1 ton/2,000 lbs

Uncontrolled PTE of PM/PM10 (tons/yr) = Maximum (units/hr) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* 8,760 hours/year \* 1 ton/2,000 lbs \* (1-Transfer efficiency)

Controlled PTE of PM/PM10 (lbs/hr) = Maximum (units/hr) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (1-Control efficiency)

Controlled PTE of PM/PM10 (tons/yr) = Max. (units/hr) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (1-Control efficiency) \* 8,760 hours/year \* 1 ton/2,000 lbs

**HAZARDOUS AIR POLLUTANTS**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hr)	Weight % Ethyl Benzene	Weight % Isocyanate	Weight % Toluene	Weight % Xylene	PTE of Ethyl Benzene (tons/yr)	PTE of Isocyanate (tons/yr)	PTE of Toluene (tons/yr)	PTE of Xylene (tons/yr)	PTE of Total HAP (tons/yr)	
<b>Basecoat Application - Step 1</b>													
BCS-605 Reducer	7.24	0.69	1.25	9.00%	0%	0%	51.0%	2.46	0	0	13.9	16.4	
Basecoat U7002	7.78	0.69	1.25	0%	0%	0%	0%	0	0	0	0	0	
<b>Clearcoat Application - Step 2</b>								<b>Totals for Step 1</b>	<b>2.46</b>	<b>0</b>	<b>0</b>	<b>13.9</b>	<b>16.4</b>
Clearcoat CC650	8.02	0.50	1.25	2.00%	0%	26.0%	8.00%	0.43	0	5.65	1.74	7.82	
CCH690 Hardener	8.71	0.26	1.25	4.00%	67.0%	0%	22.0%	0.49	8.15	0	2.68	11.3	
<b>Cleaning Solvent</b>								<b>Totals for Step 2</b>	<b>0.92</b>	<b>8.15</b>	<b>5.65</b>	<b>4.41</b>	<b>19.1</b>
P-1208 Precleaner (Unit Cleaner)	6.37	0.02	1.25	0%	0%	14.5%	0%	0	0	0.13	0	0.13	
Denatured Alcohol	6.79	0.02	1.25	0%	0%	0%	0%	0	0	0	0	0	
<b>State Potential to Emit</b>								<b>3.38</b>	<b>8.15</b>	<b>5.78</b>	<b>18.4</b>	<b>35.7</b>	

Methyl isobutyl ketone (MIBK)

**METHODOLOGY**

PTE of HAPS (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8,760 hrs/yr \* 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
VOC and Particulate  
Van Surface Coating Process (PB-3)**

**Company Name:** Marketing World Wide, LLC, dba Auto FX  
**Address City IN Zip:** 1202 Kent Street, Elkhart, Indiana 46514  
**FESOP:** 039-25284-00668  
**Reviewer:** ERG/BL  
**Date:** November 2, 2007

Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Material Usage (lbs/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC* (tons/yr)	Uncontrolled PTE of PM/PM10 (tons/yr)	**Transfer Efficiency	Controlled PTE of PM/PM10 (lbs/hr)	Controlled PTE of PM/PM10 (tons/yr)	
<b>Basecoat Application - Step 1</b>																			
BCS-605 Reducer	7.24	100%	0%	100%	0%	0%	0.69	1.25	6.24	7.24	7.24	6.24	150	27.3	0	75%	0	0	
Basecoat U7002	7.78	78.8%	0%	78.8%	0%	21.2%	0.69	1.25	6.71	6.13	6.13	5.29	127	23.2	1.56	75%	0.02	0.08	
<b>Clearcoat Application - Step 2</b>												<b>Totals for Step 1</b>	<b>11.5</b>	<b>277</b>	<b>50.5</b>	<b>1.56</b>		<b>0.02</b>	<b>0.08</b>
Clearcoat CC650	8.02	57.8%	0%	57.8%	0%	45.0%	0.50	1.25	4.96	4.64	4.64	2.87	68.8	12.6	2.29	75%	0.03	0.11	
CCH690 Hardener	8.71	33.0%	0%	33.0%	0%	67.0%	0.26	1.25	2.78	2.87	2.87	0.91	22.0	4.01	2.04	75%	0.02	0.10	
<b>Cleaning Solvent</b>												<b>Totals for Step 2</b>	<b>3.78</b>	<b>90.8</b>	<b>16.6</b>	<b>4.33</b>		<b>0.05</b>	<b>0.22</b>
P-1208 Precleaner (Unit Cleaner)	6.37	100%	0%	100%	0%	0%	0.02	1.25	0.20	6.37	6.37	0.20	4.77	0.87	0	100%	0	0	
Denatured Alcohol	6.79	95.0%	5.00%	90.0%	4.08%	0%	0.02	1.25	0.21	6.37	6.11	0.19	4.58	0.84	0	100%	0	0	
												<b>15.7</b>	<b>377</b>	<b>68.8</b>	<b>5.89</b>		<b>0.07</b>	<b>0.29</b>	

\* The source says that 10% (6.88 tpy) of the VOC emissions from PB-3 are attributed to painting plastic, and 90% (61.9 tpy) attributed to painting metal.

\*\* Coating applied using high volume, low pressure (HVLP) spray application and manual (hand wiping) cleaning. Overspray controlled by dry filters.

**METHODOLOGY**

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

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

Pounds VOC per Gallon of Solids = [Density (lb/gal) \* Weight % Organics] / (Volume % Solids)

PTE of VOC (lbs/hr) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

PTE of VOC (lbs/day) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* 8,760 hr/yr \* 1 ton/2,000 lbs

Uncontrolled PTE of PM/PM10 (tons/yr) = Maximum (units/hr) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* 8,760 hours/year \* 1 ton/2,000 lbs \* (1-Transfer efficiency)

Controlled PTE of PM/PM10 (lbs/hr) = Maximum (units/hr) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (1-Control efficiency)

Controlled PTE of PM/PM10 (tons/yr) = Max. (units/hr) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (1-Control efficiency) \* 8,760 hours/year \* 1 ton/2,000 lbs

**HAZARDOUS AIR POLLUTANTS**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hr)	Weight % Ethyl Benzene	Weight % Isocyanate	Weight % Toluene	Weight % Xylene	PTE of Ethyl Benzene (tons/yr)	PTE of Isocyanate (tons/yr)	PTE of Toluene (tons/yr)	PTE of Xylene (tons/yr)	PTE of Total HAP (tons/yr)
<b>Basecoat Application - Step 1</b>												
BCS-605 Reducer	7.24	0.69	1.25	9.00%	0%	0%	51.0%	2.46	0	0	13.9	16.4
Basecoat U7002	7.78	0.69	1.25	0%	0%	0%	0%	0.00	0	0	0	0
<b>Clearcoat Application - Step 2</b>								<b>Totals for Step 1</b>	<b>2.46</b>	<b>0</b>	<b>13.9</b>	<b>16.4</b>
Clearcoat CC650	8.02	0.50	1.25	2.00%	0%	26.0%	8.00%	0.43	0	5.65	1.74	7.82
CCH690 Hardener	8.71	0.26	1.25	4.00%	67.0%	0%	22.0%	0.49	8.15	0	2.68	11.3
<b>Cleaning Solvent</b>								<b>Totals for Step 2</b>	<b>0.92</b>	<b>8.15</b>	<b>5.65</b>	<b>4.41</b>
P-1208 Precleaner (Unit Cleaner)	6.37	0.02	1.25	0%	0%	14.51%	0%	0	0	0.13	0	0.13
Denatured Alcohol	6.79	0.02	1.25	0%	0%	0%	0%	0	0	0	0	0
<b>State Potential to Emit</b>								<b>3.38</b>	<b>8.15</b>	<b>5.78</b>	<b>18.4</b>	<b>35.7</b>

Methyl isobutyl ketone (MIBK)

**METHODOLOGY**

PTE of HAPS (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8,760 hrs/yr \* 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
Paint Preparation and Mixing**

**Company Name:** Marketing World Wide, LLC, dba Auto FX  
**Address City IN Zip:** 1202 Kent Street, Elkhart, Indiana 46514  
**FESOP:** 039-25284-00668  
**Reviewer:** ERG/BL  
**Date:** November 2, 2007

	Material Usage (lbs/hr)	Material Usage (ton/yr)	PTE of VOC (ton/yr)	PTE of PM/PM10 (ton/yr)
RV Surface Coating Booth (PB-1)	44.7	196	2.94	1.96
Van Surface Coating Process (PB-2)	21.1	92	1.39	0.92
Van Surface Coating Process (PB-3)	21.1	92	1.39	0.92
<b>Total</b>			<b>5.71</b>	<b>3.81</b>

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.