INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: February 18, 2009

RE: MAB Paints, Inc. / 167-25395-00016

FROM: Matthew Stuckey, 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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Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

MAB Paints, Inc.
180 Canal Street
Terre Haute, Indiana 47807

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

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.: F 167-25395-00016	
Issued by: Tripurari Sinha Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: February 18, 2009 Expiration Date: February 18, 2019

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary paint manufacturing operation.

Source Address:	180 Canal Street, Terre Haute, Indiana 47807
Mailing Address:	The Sherwin-Williams Company 101 Prospect Avenue-4 Midland Cleveland,OH 4115-1075
General Source Phone Number:	(812) 234-6621
SIC Code:	2851
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) boiler, identified as Boiler B2, utilizing natural gas as the primary fuel with #2 fuel oil for backup, with a maximum capacity of 6.30 MMBtu per hour, using no emission controls, constructed in 1962**,** and exhausting to stack S1.

(b) One (1) boiler, identified as Boiler B1, utilizing natural gas as the primary fuel with #2 fuel oil for backup, with a maximum capacity of 5.30 MMBtu per hour, using no emission controls, constructed in 1988, and exhausting to stack S2.

(c) Paint mixing line #1, constructed in 2002, consisting of two (2) 500-gallon grind tanks (units 101 and 102) and four (4) 1,200-gallon letdown mixer tanks (units 201-204) with a maximum capacity of 125 gal/hr.

(d) Paint mixing line #2, constructed in 2002, consisting of two (2) 500-gallon grind tanks (units 103 and 104) and four (4) 1,200-gallon letdown mixer tanks (units 201-204) with a maximum capacity of 125 gal/hr.

(e) Paint mixing line #3, constructed in 2002, consisting of one (1) 1,000-gallon grind tank (unit 105) and two (2) 2,300-gallon letdown mixer tanks (units 205 and 206) and two (2) 2,500-gallon mixer tanks (units 207 and 208) with a maximum capacity of 150 gal/hr.

(f) Paint mixing line #4, constructed in 2002,consisting of one (1) sandmill media grinder and two (2) 500-gallon letdown mixer tanks (units 106 and 107) with a maximum capacity of 125 gal/hr.

(g) One (1) Central baghouse, identified as BH-1, constructed in 2002, with a maximum airflow rate of 4,250 scfm for control of the dry ingredients used in the four (4) batch lines.

A.3 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F 167-25395-00016, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

B.8 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.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, 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.10 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.11 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 maintain and implement Preventive Maintenance Plans (PMPs) 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.

(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.12 Emergency Provisions [326 IAC 2-8-12]

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

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

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

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

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

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

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F 167-25395-00016 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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

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

(1) That this permit contains a material mistake.

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

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

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

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

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

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

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

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

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

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

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

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

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

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

B.19 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

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

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

B.23 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.24 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) Pursuant to 326 IAC 2-2 (PSD), 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.

(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]

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

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

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

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

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]

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]

(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 Licensed 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 Licensed 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]

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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)]

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 or ninety (90) days of initial start-up, whichever is later. 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]

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)]

(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]

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]

(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 or ninety (90) days of initial start-up, whichever is later.

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) 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

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) boiler, identified as Boiler B2, utilizing natural gas as the primary fuel with #2 fuel oil for backup, with a maximum capacity of 6.30 MMBtu per hour, using no emission controls, constructed in 1962**,** and exhausting to stack S1.

(b) One (1) boiler, identified as Boiler B1, utilizing natural gas as the primary fuel with #2 fuel oil for backup, with a maximum capacity of 5.30 MMBtu per hour, using no emission controls, constructed in 1988, and exhausting to stack S2.

(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 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from Boiler B2 shall not exceed 0.8 pounds per MMBtu heat input.

D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate matter (PM) emissions from Boiler B1 shall not exceed to 0.576 pounds per MMBtu heat input.

This limit was calculated using the equation below:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)
Q = total source maximum operating capacity rating (MMBtu/hr)

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) Paint mixing line #1, constructed in 2002, consisting of two (2) 500-gallon grind tanks (units 101 and 102) and four (4) 1,200-gallon letdown mixer tanks (units 201-204) with a maximum capacity of 125 gal/hr.

(d) Paint mixing line #2, constructed in 2002, consisting of two (2) 500-gallon grind tanks (units 103 and 104) and four (4) 1,200-gallon letdown mixer tanks (units 201-204) with a maximum capacity of 125 gal/hr.

(e) Paint mixing line #3, constructed in 2002, consisting of one (1) 1,000-gallon grind tank (unit 105) and two (2) 2,300-gallon letdown mixer tanks (units 205 and 206) and two (2) 2,500-gallon mixer tanks (units 207 and 208) with a maximum capacity of 150 gal/hr.

(f) Paint mixing line #4, constructed in 2002,consisting of one (1) sandmill media grinder and two (2) 500-gallon letdown mixer tanks (units 106 and 107) with a maximum capacity of 125 gal/hr.

(g) One (1) Central baghouse, identified as BH-1, constructed in 2002, with a maximum airflow rate of 4,250 scfm for control of the dry ingredients used in the four (4) batch lines.

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

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (e), the particulate matter (PM) emissions from the equipment listed above shall not exceed the pound per hour emission rate as given in the table below:

Emission Unit	Process Weight Rate (tons/hour)	PM Emission Limit (lbs/hour)
Paint Mixing Line 1	0.69	3.20
Paint Mixing Line 2	0.69	3.20
Paint Mixing Line 3	0.83	3.62
Paint Mixing Line 4	0.69	3.20

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

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

D.2.2 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 2-8-4 (FESOP), the PM_{10} emissions from Baghouse BH-1 shall not exceed 13.22 pounds per hour.

Compliance with this limit, combined with potential PM_{10} emissions from the other emission units, will limit the source wide PM_{10} emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70) not applicable to this source.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.4 Particulate Matter

(a) In order to comply with Conditions D.2.1 and D.2.2, the baghouse for PM and PM10 control shall be in operation and control emissions from the four mixing lines at all times any of the mixing lines are in operation.

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

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

D.2.5 Visible Emissions Notations

(a) Visible emission notations of each of the Baghouse BH-1 stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

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

D.2.6 Parametric Monitoring

(a) The Permittee shall record the pressure drop across Baghouse BH-1 at least once per day when the facilities are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable

response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.7 Broken or Failed Bag Detection

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

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

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

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

D.2.8 Record Keeping Requirement

(a) To document compliance with Condition D.2.4, the Permittee shall maintain a daily record of visible emission notations of the baghouses' stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).

(b) To document compliance with Condition D.2.5, the Permittee shall maintain daily records of the pressure drop across Baghouse BH-1. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name:	MAB Paints, Inc.
Source Address:	180 Canal Street, Terre Haute, Indiana 47807
Mailing Address:	The Sherwin-Williams Company, 101 Prospect Avenue-4 Midland, Cleveland,OH 4115-1075
FESOP Permit No.:	F 167-25395-00016

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:	MAB Paints, Inc.
Source Address:	180 Canal Street, Terre Haute, Indiana 47807
Mailing Address:	The Sherwin-Williams Company, 101 Prospect Avenue-4 Midland, Cleveland,OH 4115-1075
FESOP Permit No.:	F 167-25395-00016

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

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

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

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

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

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

Source Name: MAB Paints, Inc.
Source Address: 180 Canal Street, Terre Haute, Indiana 47807
Mailing Address: The Sherwin-Williams Company, 101 Prospect Avenue-4 Midland, Cleveland,OH 4115-1075
FESOP Permit No.: F 167-25395-00016

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

Page 1 of 2

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

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	MAB Paints, Inc.
Source Location:	180 Canal Street, Terre Haute, IN 47807
County:	Vigo
SIC Code:	2851
Permit No.:	F167-25395-00016
Permit Reviewer:	Timothy R. Pettifor

The Office of Air Quality (OAQ) has reviewed the operating permit application from MAB Paints, Inc., relating to the operation of a stationary paint manufacturing operation.

History

On May 14, 2007, MAB Paints, Inc. (formerly M.A. Bruder & Sons, Inc.) submitted an application to the OAQ requesting to renew its MSOP. Upon review of the application the permit level was changed to FESOP and the MSOP renewal for MAB Paints, Inc. will be withdrawn. On April 2, 2003, M.A. Bruder & Sons, Inc. was issued their original MSOP #16915 and their original application for FESOP #7825 was withdrawn on February 4, 2003.

Permitted Emission Units and Pollution Control Equipment

(a) One (1) boiler, identified as Boiler B2, utilizing natural gas as the primary fuel with #2 fuel oil for backup, with a maximum capacity of 6.30 MMBtu per hour, using no emission controls, constructed in 1962**,** and exhausting to stack S1.

(b) One (1) boiler, identified as Boiler B1, utilizing natural gas as the primary fuel with #2 fuel oil for backup, with a maximum capacity of 5.30 MMBtu per hour, using no emission controls, constructed in 1988, and exhausting to stack S2.

(c) Paint mixing line #1, constructed in 2002, consisting of two (2) 500-gallon grind tanks (units 101 and 102) and four (4) 1,200-gallon letdown mixer tanks (units 201-204) with a maximum capacity of 125 gal/hr.

(d) Paint mixing line #2, constructed in 2002, consisting of two (2) 500-gallon grind tanks (units 103 and 104) and four (4) 1,200-gallon letdown mixer tanks (units 201-204) with a maximum capacity of 125 gal/hr.

(e) Paint mixing line #3, constructed in 2002, consisting of one (1) 1,000-gallon grind tank (unit 105) and two (2) 2,300-gallon letdown mixer tanks (units 205 and 206), and two (2) 2,500 gallon mixer tanks (units 207-208) with a maximum capacity of 150 gal/hr.

(f) Paint mixing line #4, constructed in 2002,consisting of one (1) sandmill media grinder and two (2) 500-gallon letdown mixer tanks (units 106 and 107) with a maximum capacity of 125 gal/hr.

(g) One (1) Central baghouse, identified as BH-1, constructed in 2002, with a maximum airflow rate of 4,250 scfm for control of the dry ingredients used in the four (4) batch lines.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

The source is not operating emission units or pollution control equipment without a permit.

Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Two (2) horizontal bulk storage tanks, identified as tanks 1a and 1c, constructed in the 1930s, each with a maximum capacity of 2,879 gallons.

(b) One (1) horizontal bulk storage tank, identified as tank 1b, constructed in the 1930s, with a maximum capacity of 2,422 gallons.

(c) One (1) horizontal bulk storage tank, identified as tank 2a, constructed in the 1930s, with a maximum capacity of 4,174 gallons.

(d) Two (2) horizontal bulk storage tanks, identified as tanks 4 and 5, constructed in the 1930s, each with a maximum capacity of 8,050 gallons.

(e) One (1) horizontal bulk storage tank, identified as tank 7, constructed in the 1930s, with a maximum capacity of 7,902 gallons.

(f) Two (2) horizontal bulk storage tank, identified as tank 8a and 8b, constructed in the 1930s, with a maximum capacity of 4,940.

(g) Two (2) horizontal bulk storage tank, identified as tanks 9a and 10a, constructed in the 1930s, each with a maximum capacity of 5,076 gallons.

(h) One (1) horizontal bulk storage tank, identified as tank 10a, constructed before 1960, with a maximum capacity of 5076 gallons.

(i) Two (2) horizontal bulk storage tanks, identified as tanks 11a and 11b, constructed before 1960, with a maximum capacity of 4,230 gallons.

(j) Three (3) horizontal bulk storage tanks, identified as tanks 12a, 12b, and 12c, constructed in the 1930's, each with a maximum capacity of 3,384 gallons.

(k) One (1) horizontal bulk storage tank, identified as tank 13, constructed before 1960, with a maximum capacity of 10,152 gallons.

(l) Two (2) horizontal bulk storage tanks, identified as tanks 14a and 14b, constructed before 1960, each with a maximum capacity of 5,076 gallons.

(m) Two (2) horizontal bulk storage tanks, identified as tanks 15a and 15b, constructed before 1960, each with a maximum capacity of 5,076.

(n) Two (2) bulk powder system tanks for internal storage and delivery, constructed in 2006, each with a maximum capacity of 8,000 pounds.

(o) One (1) 1-gallon traypack filler, one (1) 1-gallon casepack filler, one (1) 5-gallon modac filler, one (1) 5-gallon pail filling line and one (1) handfiller. The five fillers can fill products from any of the four mixing lines.

Existing Approvals

Since the issuance of the MSOP 167-16915-00016 on April 2, 2003, the source has constructed or has been operating under the following approvals as well:

(a) MSOP Significant Permit Revision 167-18020-00016 issued on November 25, 2003.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit.

The following terms and conditions from previous approvals have been revised in this FESOP:

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Vigo County

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

(1) 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.

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte,

Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

(4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Vigo County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Vigo County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	113.63
PM_{10}	113.63
SO_2	25.77
VOC	58.58
CO	4.27
NO_x	7.26

HAPs	tons/year
Xylene	4.75
Ethylbenzene	0.90
Toluene	6.93
MIK	2.25
Benzene	1.07E-04
Dichlorobenzene	6.10E-05
Formaldehyde	3.81E-03
Hexane	9.15E-02
Total	**14.92**

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM_{10} is equal to or 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 PM_{10} to less than Title V levels, therefore the source will be issued a FESOP.

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

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less 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 less than twenty-five (25) tons per year.

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 has opted to become 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.

Potential To Emit						
Process/ Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**
Paint Line #1	57.9	57.9	--	13.88	--	--
Paint Line #2			--	13.88	--	--
Paint Line #3			--	16.66	--	--
Paint Line #4			--	13.88	--	--
Boiler B1 Natural Gas	0.04	0.18	0.01	0.13	1.95	2.32
Boiler B1 Fuel Oil	0.33	0.33	11.77	0.06	0.83	3.32
Boiler B2 Natural Gas	0.05	0.21	0.02	0.15	2.32	2.76
Boiler B2 Fuel Oil	0.39	0.39	13.99	0.07	0.99	3.94
Total Emissions	**58.63**	**58.63**	**25.77**	**58.58**	**4.27**	**7.26**

(a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant are 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

The following federal rules are applicable to the source:

(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) Bulk storage tanks 1a, 1b, 1c, 2a, 4, 5, 7, 8a, 8b, 9a, 9b, 10a, 11a, 11b, 12a, 12b, 12c, 13, 14a, 14b, 15a, 15b, are not subject to the requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids, 40 CFR 60, Subpart Kb, because they were constructed before July 23, 1984, the applicability date of this rule, and all of the tank's capacities are less than 39,890 gallons (75 cubic meters).

(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.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)
The uncontrolled potential to emit of all regulated pollutants is less than 250 tons per year, and it is not one of the twenty-eight (28) listed source categories. Therefore, the source is a minor source for PSD.

326 IAC 2-6 (Emission Reporting)
Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The permittee is not required to submit an emission statement.

326 IAC 2-8-4 (FESOP)
The uncontrolled PM10 emissions are more than 100 tons per year for this source. Therefore a federally enforceable PM10 emissions limit has been established for this source. The PM_{10} emissions from Baghouse BH-1 shall not exceed 13.22 lbs/hour.

Compliance with the above limit, combined with potential PM_{10} emissions from the other emission units, will limit the source wide PM_{10} emissions to less than 100 tons per year and will render 326 IAC 2-7 (Part 70) not applicable to this source.

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

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

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

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)
Each facility has the potential to emit less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)
Boiler A, #2 was constructed in 1962 and therefore is subject to 326 IAC 6-2-3 limiting facilities existing and in operation prior to September 21, 1983 by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

= 3.58 lb/MMBtu

Where:

C = 50 micrograms/cu. Meter, maximum ground level concentration
Q = 6.30 MMBtu/hr, heat input rate
N = number of stacks
a = 0.67 dimensionless, plume rise factor
h = 32.5 ft, average stack height

However, pursuant to 326 IAC 6-2-3 (d), the pariculate emission from Boiler B2, shall not exceed 0.8 lb/MMBtu.

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)
Boiler B1, rated at 5.3 million British thermal units per hour is subject to 326 IAC 6-2-4 because it was installed in 1988. The PM emission limitations are based on the following equation given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

$$Pt = 1.09/(11.60)^{0.26} = 0.576 \text{ lb/MMBtu heat input}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
The potential sulfur dioxide emissions from Boiler B2 and Boiler B1 are each less than twenty-five tons per year. Therefore, the requirements of 326 IAC 7-1.1 are not applicable.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326-IAC 6-3-2, the particulate from the paint lines shall be limited by the following:

Emission Unit	Process Weight Rate (tons/hour)	Emission Limit (lbs/hour)
Paint Mixing Line 1	0.69	3.20
Paint Mixing Line 2	0.69	3.20
Paint Mixing Line 3	0.83	3.62
Paint Mixing Line 4	0.69	3.20

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

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

The Baghouse BH-1 shall be in operation at all times any of the paint mixing lines are in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)
The potential VOC emissions from each paint line are each less than twenty-five tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Control	**Parameter**	**Frequency**	**Range**	**Excursions and Exceedances**
Baghouse BH-1	Water Pressure Drop	Daily	2 to 6 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

This monitoring condition is necessary because the baghouse for the paint lines must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Recommendation

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

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

An application for the purposes of this review was received on October 11, 2007. Additional information was received on November 07, 2008.

Conclusion

The operation of this stationary paint manufacturing operation shall be subject to the conditions of the attached FESOP No. F167-25395-00016.

Appendix A: Emissions Calculations
Boiler B1 Date Installed 1988
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: MAB paints, Inc.
Address City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.30	46.4

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.18	0.01	2.32	0.13	1.95

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Boiler B1 Date Installed 1988
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: MAB Paints, Inc.
Address City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

	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 Emission in tons/yr	4.875E-05	2.786E-05	1.741E-03	4.179E-02	7.893E-05

	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 Emission in tons/yr	1.161E-05	2.554E-05	3.250E-05	8.821E-06	4.875E-05

Methodology is the same as page 1.

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

Appendix A: Emissions Calculations
Boiler B2 Date Installed 1962
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: MAB Paints, Inc.
Address City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
6.30	55.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.05	0.21	0.02	2.76	0.15	2.32

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Boiler B2 Date Installed 1962
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: MAB Paints, Inc.
Address City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

	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 Emission in tons/yr	5.795E-05	3.311E-05	2.070E-03	4.967E-02	9.382E-05

	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 Emission in tons/yr	1.380E-05	3.035E-05	3.863E-05	1.049E-05	5.795E-05

Methodology is the same as page 1.

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

Appendix A: Emissions Calculations
BoilerB1 Installed 1988
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: MAB Paints, Inc.
Address, City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
		0.5
5.3	331.6285714	

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	71 *(142.0S)*	20.0	0.34	5.0
Potential Emission in tons/yr	0.33	11.77	3.32	0.06	0.83

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
See page 2 for HAPs emission calculations.

Appendix A: Emissions Calculations
BoilerB1 Installed 1988
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: MAB Paints, Inc.
Address, City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	9.29E-05	6.96E-05	6.96E-05	6.96E-05	2.09E-04

	HAPs - Metals (continued)			
	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	6.96E-05	1.39E-04	6.96E-05	3.48E-04

Methodology

No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emissions Calculations
BoilerB2 Installed 1962
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: MAB Paints, Inc.
Address, City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
		0.5
6.3	394.2	

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	71 *(142.0S)*	20.0	0.34	5.0
Potential Emission in tons/yr	0.39	13.99	3.94	0.07	0.99

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

See page 8 for HAPs emission calculations.

Appendix A: Emissions Calculations
BoilerB2 Installed 1962
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: MAB Paints, Inc.
Address, City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-24772-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	1.10E-04	8.28E-05	8.28E-05	8.28E-05	2.48E-04

	HAPs - Metals (continued)			
	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	8.28E-05	1.66E-04	8.28E-05	4.14E-04

Methodology

No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emissions Calculations
Both Boilers Using Natural Gas
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: MAB Paints, Inc.
Address City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

Boiler B2: 6.3 MMBtu/hr
Boiler B1: 5.3 MMBtu/hr

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
11.60	101.6

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.10	0.39	0.03	5.08	0.28	4.27

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 10 for HAPs emissions calculations.

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

Company Name: MAB Paints, Inc.
Address City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

	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 Emission in tons/yr	1.067E-04	6.097E-05	3.811E-03	9.145E-02	1.727E-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 Emission in tons/yr	2.540E-05	5.589E-05	7.113E-05	1.931E-05	1.067E-04

Methodology is the same as page 1.

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

Appendix A: Emissions Calculations
Both Boilers Using Fuel Oil
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: MAB Paints, Inc.
Address, City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

Boiler B2: 6.3 MMBtu/hr
Boiler B1: 5.3 MMBtu/hr

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
		0.5
11.6	725.8285714	

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	71 *(142.0S)*	20.0	0.34	5.0
Potential Emission in tons/yr	0.73	25.77	7.26	0.12	1.81

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
See page 12 for HAPs emission calculations.

Appendix A: Emissions Calculations
Both Boilers Using Fuel Oil
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: MAB Paints, Inc.
Address, City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	2.03E-04	1.52E-04	1.52E-04	1.52E-04	4.57E-04

	HAPs - Metals (continued)			
	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	1.52E-04	3.05E-04	1.52E-04	7.62E-04

Methodology

No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emissions Calculations
PM/PM10, VOC, HAP Emissions
From Four Batch Lines

Company Name: MAB Paints, Inc.
Address, City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

Potential to Emit PM/PM10 & VOC

Line	Maximum Process Production (gal/hr)	Maximum Process Production (lb/hr)	Maximum Process Production (ton/hr)	Maximum Pigment (ton/hr)	Product (ton/yr)	PM/PM10 Emission factor (lb/ton)	PM/PM10 Emissions (ton/yr)	VOC Emission Factor (lb/ton)	VOC Emissions (ton/yr)
Paint Mixing Line #1, Solvent-based	125.00	1375.00	0.69	0.31	6022.50	20.00	26.88	4.61	13.88
Paint Mixing Line #2, Solvent-based	125.00	1375.00	0.69	0.31	6022.50	20.00	26.88	4.61	13.88
Paint Mixing Line #3, Solvent-based	150.00	1650.00	0.83	0.37	7227.00	20.00	32.26	4.61	16.66
Paint Mixing Line #4, Solvent-based	125.00	1375.00	0.69	0.31	6022.50	20.00	26.88	4.61	13.88
Maximum Emissions (ton/yr)								**112.91**	**58.30**

* Assume all PM emissions equal PM10 emissions.

Methodology
Weight of paint/gallon averages 11 lb/gal with 4.91 pounds of pigment per gallon produced.
PM emission factor equals 20 lb/ton pigment. Emission Factor From AP-42 6.4, Table 6.4-1 VOC emission factor was calculated from Sherwin-Williams' Batch Air Module and is consistent with stack test performed at the site on August 20, 2008.
Maximum pigment is taken as 30 percent of final product added as bag and drum solids in powders and granules per plant schematic revised 03/21/07.

HAPs

HAP	**Actual Emissions (lbs/yr)**	**Production Scale-up Factor**	**Maximum HAP (ton/yr)**
Ethylebenzene	92.52	19.49	0.902
Xylene	487.1	19.49	4.747
Toluene	711.38	19.49	6.932
MIK	230.69	19.49	2.248
Total HAPs emissions (ton/yr)			**14.83**

Actual emissions based on 235,972 gallons of production. Maximum annual production capacity is 4,599,000.
Scale-up factor is 4,599,000/235,972 = 19.40

Appendix A: Emissions Calculations
Summary-Uncontrolled Emissions

Company Name: MAB Paints, Inc.
Address, City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

Potential to Emit (ton/yr)						
Process	PM	PM_{10}	SO_2	NO_x	VOC	CO
Paint Line #1 Solvent	26.88	26.88	--	--	13.88	--
Paint Line #2 Solvent	26.88	26.88	--	--	13.88	--
Paint Line #3 Solvent	32.26	32.26	--	--	16.66	--
Paint Line #4 Solvent	26.88	26.88	--	--	13.88	
Boiler B1 Natural Gas	0.04	0.18	0.01	2.32	**0.13**	**1.95**
Boiler B1 Fuel Oil	**0.33**	**0.33**	**11.77**	**3.32**	0.06	0.83
Boiler B2 Natural Gas	0.05	0.21	0.02	2.76	**0.15**	**2.32**
Boiler B2 Fuel Oil	**0.39**	**0.39**	**13.99**	**3.94**	0.07	0.99
Worst Case PTE (ton/yr)	**113.63**	**113.63**	**25.77**	**7.26**	**58.58**	**4.27**

Potential to Emit Organic HAPs (ton/yr)									
Process	Xylene	Ethylbenzene	Toluene	MIK	Benzene	Dichloro-benzene	Form-aldehyde	Hexane	Total HAPs
Paint Mixing	4.747	0.902	6.932	2.248	--	--	--	--	14.829
Boiler B1 Natural Gas	--	--	7.89E-05	--	4.87E-05	2.79E-05	1.74E-03	4.18E-02	4.37E-02
Boiler B1 Fuel Oil	--	--	--	--	--	--	--	--	--
Boiler B2 Natural Gas	--	--	9.38E-05	--	5.79E-05	3.31E-05	2.07E-03	4.97E-02	5.19E-02
Boiler B2 Fuel Oil	--	--	--	--	--	--	--	--	--
Worst Case PTE (ton/yr)	**4.75**	**0.90**	**6.93**	**2.25**	**1.07E-04**	**6.10E-05**	**3.81E-03**	**9.15E-02**	**14.92**

Appendix A: Emissions Calculations
Summary-Limited Emissions

Company Name: MAB Paints, Inc.
Address, City IN Zip: 180 Canal Street, Terre Haute, IN 47807
Permit Number: F167-25395-00016
Reviewer: Timothy R. Pettifor
Date: 29-Dec-08

Potential to Emit (ton/yr)						
Process	PM	PM_{10}	SO_2	NO_x	VOC	CO
Paint Line #1 Solvent	57.9	57.9	--	--	13.88	--
Paint Line #2 Solvent			--	--	13.88	--
Paint Line #3 Solvent			--	--	16.66	--
Paint Line #4 Solvent			--	--	13.88	
Boiler B1 Natural Gas	0.04	0.18	0.01	2.32	**0.13**	**1.95**
Boiler B1 Fuel Oil	**0.33**	**0.33**	**11.77**	**3.32**	0.06	0.83
Boiler B2 Natural Gas	0.05	0.21	0.02	2.76	**0.15**	**2.32**
Boiler B2 Fuel Oil	**0.39**	**0.39**	**13.99**	**3.94**	0.07	0.99
Worst Case PTE (ton/yr)	**58.63**	**58.63**	**25.77**	**7.26**	**58.58**	**4.27**

Potential to Emit Organic HAPs (ton/yr)									
Process	Xylene	Ethylbenzene	Toluene	MIK	Benzene	Dichloro-benzene	Form-aldehyde	Hexane	Total HAP's
Paint Mixing	4.747	0.902	6.932	2.248	--	--	--	--	14.829
Boiler B1 Natural Gas	--	--	7.89E-05	--	4.87E-05	2.79E-05	1.74E-03	4.18E-02	4.37E-02
Boiler B1 Fuel Oil	--	--	--	--	--	--	--	--	--
Boiler B2 Natural Gas	--	--	9.38E-05	--	5.79E-05	3.31E-05	2.07E-03	4.97E-02	5.19E-02
Boiler B2 Fuel Oil	--	--	--	--	--	--	--	--	--
Worst Case PTE (ton/yr)	**4.75**	**0.90**	**6.93**	**2.25**	**1.07E-04**	**6.10E-05**	**3.81E-03**	**9.15E-02**	**14.92**