



August 27, 2008

Mr. Paul Volkmer
Modular Space Corporation dba ModSpace
1200 Swedesford Road
Berwyn, PA 19312

Certified Mail Number: 7008 0150 0003 5219 3431

Re: Permit by Rule Status
097-25618-00337

Dear Mr. Volkmer:

The application from Modular Space Corporation dba ModSpace was received by the Indianapolis Office of Environmental Services (OES) on December 4, 2007. Additional information was received from ModSpace by OES on August 18, 2008 requesting to change the permit application level from Source Specific Operating Agreement to Permit by Rule. Based on the data and information submitted and the provisions of 326 IAC 2-10 (Permit by Rule), ModSpace states that the painting operation for modular units, located at 3268 South Harding Street, Indianapolis, Indiana 46217 satisfies the criteria to operate under the Permit by Rule provisions. OES has evaluated the emissions of the source for calendar years 2006 and 2007. These emissions are within the threshold allowed under 326 IAC 2-10.

This Permit by Rule (PBR) supersedes Source Specific Operating Agreement (SSOA) No. SSOA097-10119-00337, issued by OES on November 9, 1998. SSOA097-10119-00337 was revoked by Revocation No. R097-25617-00337, issued by OES on August 27, 2008.

Pursuant to 326 IAC 2-10 (Permit by Rule), this source shall comply with the following conditions:

- (a) The source limits actual emissions for every twelve (12) month period to less than twenty percent (20%) of any threshold for the following:
 - (1) A major source of regulated air pollutants, as defined by 326 IAC 2-7-1(22) (i.e., one hundred (100) tons per year of any regulated air pollutant, in all areas except areas classified as serious, severe, and extreme nonattainment for ozone). [326 IAC 2-10-3.1(1)(A)]
 - (2) A major source of hazardous air pollutants (HAPs), as defined in Section 112 of the Clean Air Act (i.e., ten (10) tons per year of any individual HAP or twenty-five (25) tons per year of any combination of HAPs). [326 IAC 2-10-3.1(1)(B)]
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations. [326 IAC 2-10-3.1(2)]
- (c) Not later than thirty (30) days after receipt of written request by the City of Indianapolis Office of Environmental Services (OES), Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), or U.S. Environmental Protection Agency (EPA), the owner or operator shall demonstrate that the source is in compliance with the above-mentioned conditions. [326 IAC 2-10-4.1]
- (d) Compliance demonstration shall be based on actual emissions for the previous 12 months and may include, but is not limited to, fuel or material usage or production records. No other demonstration of compliance shall be required. [326 IAC 2-10-4.1]



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

This source is hereby notified that this Permit by Rule approval does not relieve the source of the responsibility to comply with the provisions of any applicable federal, state, or local requirements, such as New Source Performance Standards (NSPS), 40 CFR Part 60, or National Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 or Part 63. [326 IAC 2-10-5.1]

Any change or modification which will alter operations in such a way that the source will no longer comply with 326 IAC 2-10 (Permit by Rule), must obtain the appropriate approval from OES and OAQ under 326 IAC 2-1.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, 326 IAC 2-8, or 326 IAC 2-9 before such change may occur. This source may at any time apply for a state operating permit under 326 IAC 2-6.1, a Part 70 permit under 326 IAC 2-7, a FESOP under 326 IAC 2-8, or an operating agreement under 326 IAC 2-9, as applicable. [326 IAC 2-10-1(b)]

Any violation of 326 IAC 2-10 (Permit by Rule) may result in administrative or judicial enforcement proceedings under IC 13-30-3 and penalties under IC 13-30-4.

A copy of the PBR is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

If you have any questions on this matter, please contact Mark Caraher, of my staff, at 317-327-2272, or mcaraher@indygov.org.

Sincerely,

ORIGINAL SIGNED BY

Kyle Walker
Deputy Director
Department of Public Works

mbc

cc: Permits, Mark Caraher
Marion County Health Department
Air Compliance, Matt Mosier
IDEM, Mindy Hahn