INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 25, 2008

RE: NCP Coatings, Inc. / 141-25786-00196

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07

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Indianapolis, Indiana 46204-2251
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January 25, 2008

Mike Glasgow
NCP Coatings, Inc.
1413 Clover Road
Mishawaka, Indiana 46545

Re: 141-25786-00196
First Notice-Only Change to
M141-24162-00196

Dear Mike Glasgow:

NCP Coatings, Inc. was issued a Minor Source Operating Permit (MSOP) Renewal No. M141-24162-00196 on August 30, 2007 for a stationary paint manufacturing and packaging operation located at 1413 Clover Road, Mishawaka, Indiana 46545. On December 26, 2007, the Office of Air Quality (OAQ) received an application from the source relating to the construction and operation of a new solvent based stain mixing and packaging line that is of the same type and capacity as the other permitted paint mixing line and small batch paint transfer/container filling operation. The new solvent based stain mixing and packaging line will comply with the same applicable requirements and permit terms and conditions as the existing paint mixing line and small batch paint transfer/container filling operation, but will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. The uncontrolled/unlimited potential to emit of the entire source will continue to be less than the threshold levels specified in 326 IAC 2-7. Attachment A illustrates the unlimited potential to emit (PTE) of the new solvent based stain mixing and packaging line and controlled PTE of the entire source after issuance of this notice only change. The addition of the new solvent based stain mixing and packaging line to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13).

The addition of the new solvent based stain mixing and packaging line to NCP Coatings, Inc. involves the following rule applicabilities:

Federal Rule Applicability

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

(b) There are no new National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.

State Rule Applicability – Stain Mixing Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
This rule establishes emission limitations for particulate emissions from manufacturing processes located anywhere in the state. Since the new paint mixing operations are not one of the specifically exempted manufacturing processes listed in 326 IAC 6-3-1(b), and because the new paint mixing operations are not one of the manufacturing processes specifically listed in 326 IAC 6-3-2(b) through (d), pursuant to 326 IAC 6-3-2(e), the particulate emissions shall be limited as follows:

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

Based on calculations, a control device is not needed for the new solvent based stain mixing and packaging line to comply with this limit.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
This rule applies to New Facilities (as of January 1, 1980) which have potential emissions of 25 tons or more per year, are located anywhere in the state; and are not otherwise regulated by any other provisions of Article 326 IAC 8. Although constructed after January 1, 1980, the new paint mixing operations are not subject to the requirements of 326 IAC 8-1-6, because the potential VOC emissions are less than twenty-five (25) tons per year.

State Rule Applicability - Natural Gas Combustion

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The natural natural gas-fired make-up air heater, is not subject to 326 IAC 6-2 because it is not a source of indirect heating.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural natural gas-fired make-up air heater, is not subject to the requirements of 326 IAC 6-3, since it is not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)
The natural natural gas-fired make-up air heater, is not subject to the requirements of 326 IAC 7-1, because the potential and the actual sulfur dioxide emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby revised as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

A.2 Emission Units and Pollution Control Equipment Summary

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

...

(b) One (1) paint mixing line located in Building 15, approved for construction in 2008, identified as Mix Line #2, with a maximum throughput capacity of 0.57 tons per hour of dry pigment, uncontrolled and venting to the inside, including:

(1) Two (2) air-powered drum mixers, identified as DM1 & DM2; and

(2) Four (4) air-powered pail mixers, identified as PM 1 through PM4.

(**c** ~~b~~) One (1) manual small batch paint transfer/container filling operation, identified as SBF, approved for construction in 2007 and rated at sixteen and six-tenths (16.6) units per hour.

(**d** ~~c~~) Four (4) submerged filling stations, identified as 1 through 4, and constructed in 2000.

(**e** ~~d~~) Two (2) storage tanks, identified as Tank #5 and Tank PG-1, constructed prior to 1970, with a maximum capacity of 8,000 gallons and 4,200 gallons, respectively.

(**f** ~~e~~) Combustion units including:

(1) One (1) natural gas-fired boiler, identified as BH-5, constructed prior to 1970, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr).

(2) Two (2) natural gas-fired heaters, identified as H-3 and H-4, constructed prior to 1970, each with a maximum heat input capacity of 0.25 MMBtu/hr.

(3) One (1) natural gas-fired make-up air heater, identified as AM-B15, located in Building 15, approved for construction in 2008, with a maximum capacity of 0.40 MMBtu per hour, uncontrolled and exhausting to SVAM-B15.

(**g** ~~f~~) Paved and unpaved roads and parking lots with public access.

(**h** ~~g~~) Activities including the replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(**i** ~~h~~) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(**j** ~~i~~) Blowdown of boilers.

…

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

…

(b) One (1) paint mixing line located in Building 15, approved for construction in 2008, identified as Mix Line #2, with a maximum throughput capacity of 0.57 tons per hour of dry pigment, uncontrolled and venting to the inside, including:

(1) Two (2) air-powered drum mixers, identified as DM1 & DM2; and

(2) Four (4) air-powered pail mixers, identified as PM 1 through PM4.

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

…

D.1.2 Particulate (Particulate Emission Limitations for Manufacturing Processes) [326 IAC 6-3-2]

…

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Mix Line #1	mixer #s 6, 7, 8, and 10	0.46	2.44
Mix Line #1	one (1) 20 liter horizontal small batch mill and mixer	0.13	1.05
Mix Line #2	**air-powered mixers (drum and pail) #DM1, DM2, PM1 - PM4**	**0.05**	**0.57**

…

Additionally, NCP Coatings, Inc. has requested that the permit be revised to allow further clarification of the emission unit description for the one (1) existing paint mixing line, identified as Mix Line #1. The words "**of dry pigment** "will be appended to the maximum throughput capacity descriptor. This change to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(2).

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) paint mixing line, constructed in 2002, identified as Mix Line #1 including four (4) paint mixer tanks, identified as Mixer #s 6, 7, 8, and 10, with a maximum throughput capacity of 0.46 tons per hour **of dry pigment**, and one (1) 20 liter horizontal small batch mill and mixer, constructed in 2004, with a maximum throughput capacity of 0.13 tons per hour **of dry pigment**, and particulate matter from the mixing line controlled by Torit Dust Collector D-1.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

(a) One (1) paint mixing line, constructed in 2002, identified as Mix Line #1 including four (4) paint mixer tanks, identified as Mixer #s 6, 7, 8, and 10, with a maximum throughput capacity of 0.46 tons per hour **of dry pigment**, and one (1) 20 liter horizontal small batch mill and mixer, constructed in 2004, with a maximum throughput capacity of 0.13 tons per hour **of dry pigment**, and particulate matter from the mixing line controlled by Torit Dust Collector D-1.

...

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

...

Finally, NCP Coatings, Inc. is requesting that the MSOP Renewal permit term be extended to ten (10) years. On December 16, 2007, rule revisions to 326 IAC 2-1.1-9 and 326 IAC 2-6.1-7 were finalized allowing for ten (10) year permit terms on MSOP renewals. This change to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(6), since it incorporates newly applicable requirements as a result of a change in applicability.

(a) The expiration date on the cover page has been extended by five (5) years as follows:

Issuance Date: August 30, 2007
Expiration Date: August 30, ~~2012~~ **2017**

(b) Condition B.2 has been revised to reflect the ten (10) year permit term.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M141-24162-00196, is issued for a fixed term of ~~five (5)~~ **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.

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Hannah L. Desrosiers, of my staff, at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,

Original signed by
Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit
Attachment A

IC/hld

cc: File – St. Joseph County
St. Joseph County Health Department
U.S. EPA, Region V
Air Compliance Section
IDEM Northern Regional Office
Compliance Data Section
Technical Support and Modeling
Permits Administrative and Development
Billing, Licensing, and Training Section

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MINOR SOURCE OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

NCP Coatings, Inc.
1413 Clover Road
Mishawaka, Indiana 46545

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M141-24162-00196	
Issued by: *Original signed by* Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 30, 2007 Expiration Date: August 30, 2017

First Administrative Amendment No.: M141-25786-00196	
Issued by: *Original signed by* Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 25, 2008 Expiration Date: August 30, 2017

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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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary paint manufacturing and packaging operation.

Source Address:	1413 Clover Road, Mishawaka, Indiana 46545
Mailing Address:	1413 Clover Road, Mishawaka, Indiana 46545
General Source Phone Number:	(574) 255-9678
SIC Code:	2851
County Location:	St. Joseph
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) paint mixing line, constructed in 2002, identified as Mix Line #1 including four (4) paint mixer tanks, identified as Mixer #s 6, 7, 8, and 10, with a maximum throughput capacity of 0.46 tons per hour of dry pigment, and one (1) 20 liter horizontal small batch mill and mixer, constructed in 2004, with a maximum throughput capacity of 0.13 tons per hour of dry pigment, and particulate matter from the mixing line controlled by Torit Dust Collector D-1.

(b) One (1) paint mixing line located in Building 15, approved for construction in 2008, identified as Mix Line #2, with a maximum throughput capacity of 0.57 tons per hour of dry pigment, uncontrolled and venting to the inside, including:

(1) Two (2) air-powered drum mixers, identified as DM1 & DM2; and

(2) Four (4) air-powered pail mixers, identified as PM 1 through PM4.

(c) One (1) manual small batch paint transfer/container filling operation, identified as SBF, approved for construction in 2007 and rated at sixteen and six-tenths (16.6) units per hour.

(d) Four (4) submerged filling stations, identified as 1 through 4, and constructed in 2000.

(e) Two (2) storage tanks, identified as Tank #5 and Tank PG-1, constructed prior to 1970, with a maximum capacity of 8,000 gallons and 4,200 gallons, respectively.

(f) Combustion units including:

(1) One (1) natural gas-fired boiler, identified as BH-5, constructed prior to 1970, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr).

(2) Two (2) natural gas-fired heaters, identified as H-3 and H-4, constructed prior to 1970, each with a maximum heat input capacity of 0.25 MMBtu/hr.

(3) One (1) natural gas-fired make-up air heater, identified as AM-B15, located in Building 15, approved for construction in 2008, with a maximum capacity of 0.40 MMBtu per hour, uncontrolled and exhausting to SVAM-B15.

(g) Paved and unpaved roads and parking lots with public access.

(h) Activities including the replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(j) Blowdown of boilers.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M141-24162-00196, 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

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

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

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

B.7 Duty to Provide Information

(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

(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 Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 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, IN 46204-2251

(c) The notification 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.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

(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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M141-24162-00196 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. 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 ninety (90) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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 shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 permitted 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [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.

(b) 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.19 Credible Evidence [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 2-6.1-5(a)(1)]

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.7 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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

C.11 Instrument Specifications [326 IAC 2-1.1-11]

(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

C.12 Response to Excursions or Exceedances

(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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(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 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) 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

(b) 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.

(c) 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).

(d) 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.

(e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

(a) One (1) paint mixing line, constructed in 2002, identified as Mix Line #1 including four (4) paint mixer tanks, identified as Mixer #s 6, 7, 8, and 10, with a maximum throughput capacity of 0.46 tons per hour of dry pigment, and one (1) 20 liter horizontal small batch mill and mixer, constructed in 2004, with a maximum throughput capacity of 0.13 tons per hour of dry pigment, and particulate matter from the mixing line controlled by Torit Dust Collector D-1.

(b) One (1) paint mixing line located in Building 15, approved for construction in 2008, identified as Mix Line #2, with a maximum throughput capacity of 0.57 tons per hour of dry pigment, uncontrolled and venting to the inside, including:

(1) Two (2) air-powered drum mixers, identified as DM1 & DM2; and

(2) Four (4) air-powered pail mixers, identified as PM 1 through PM4.

(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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to MSOP 141-15583-00196, issued on April 9, 2002, and as revised in this Renewal M141-24162-00196, the usage of VOC containing material loaded to Mix Line #1 shall be limited to 1,600 tons per twelve (12) consecutive month period with compliance determined at the end of each month, and the VOC emissions shall be limited to thirty (30) pounds per ton of VOC containing material.

D.1.2 Particulate (Particulate Emission Limitations for Manufacturing Processes) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the following operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Mix Line #1	mixer #s 6, 7, 8, and 10	0.46	2.44
Mix Line #1	one (1) 20 liter horizontal small batch mill and mixer	0.13	1.05
Mix Line #2	air-powered mixers (drum and pail) #DM1, DM2, PM1 - PM4	0.05	0.57

The pounds per hour limitations were calculated using the following equation:

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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.1.4 Particulate Control

(a) In order to comply with Condition D.1.2, the Torit dust collector, identified as D-1, shall be in operation at all times Mix Line #1 is 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.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1.

(1) The amount of each VOC containing material used in Mix Line #1;

(2) The estimated VOC emissions from Mix Line #1 emitted for each compliance period;

(3) Material Safety Data Sheets (MSDS) for all materials used; and

(4) Purchase orders and invoices of all VOC containing materials used.

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

D.1.6 Reporting Requirements

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

(e) Combustion units including:

(1) One (1) natural gas-fired boiler, identified as BH-5, constructed prior to 1970, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr).

(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

D.2.1 Particulate Matter (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2, the PM emissions from boiler BH-5 shall not exceed 0.6 lb PM/MMBtu.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch

Quarterly Report

Source Name: NCP Coatings, Inc.
Source Address: 1413 Clover Road, Mishawaka, Indiana 46545
MSOP No.: 141-24162-00196
Parameter: the usage of VOC containing material loaded to Mix Line #1
Limit: Less than 1,600 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER:_____ YEAR: _____

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

9 No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: NCP Coatings, Inc.
Source Address: 1413 Clover Road, Mishawaka, Indiana 46545
Mailing Address: 1413 Clover Road, Mishawaka, Indiana 46545
MSOP No.: 141-24162-00196

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	NCP Coatings, Inc.
Address:	1413 Clover Road
City:	Mishawaka, Indiana 46545
Phone #:	(574) 255-9678
MSOP #:	M141-24162-00196

I hereby certify that NCP Coatings, Inc. is :
□ still in operation.
□ no longer in operation.

I hereby certify that NCP Coatings, Inc. is :
□ in compliance with the requirements of MSOP M141-24162-00196.
□ not in compliance with the requirements of MSOP M141-24162-00196.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMI LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

Appendix A: Emissions Calculations
Emission Summary

Company Name: NCP Coatings, Inc.
Address City IN Zip: 1413 Clover Road, Mishawaka, Indiana 46545
MSOP Renewal: 141-24162-00196
Permit Revision No.: 141-25786-00196
Reviewer: Hannah L. Desrosiers
Date Received: 12/26/2007

		Uncontrolled Potential Emissions (tons/year)						
		Emissions Generating Activity						
		Existing Emission Units				New Emission Units		
Category	Pollutant	Natural Gas Combustion	Storage	Mixing Line #1	SBF	Natural Gas Combustion	Mixing Line #2	**TOTAL**
Criteria	PM	0.07	0	55.72	0.00	0.00	0.30	56.09
Pollutants	PM10	0.08	0	55.72	0.00	0.01	0.30	56.11
	SO2	0.03	0	0	0	0.00	0	0.03
	NOx	4.24	0	0	0	0.18	0	4.42
	VOC	0.23	0.15	55.35	5.59	0.01	8.63	69.96
	CO	3.57	0	0	0	0.15	0	3.71
Hazardous	Benzene	8.91E-05	0	0	0	3.68E-06	0	9.28E-05
Air	Dichlorobenzene	5.09E-05	0	0	0	2.10E-06	0	5.30E-05
	Ethylbenzene	0	0	0	0.57	0	0	5.65E-01
Pollutants	Formaldehyde	3.18E-03	0	0	0	1.31E-04	0	3.31E-03
	Hexane	7.64E-02	0	0	0	3.15E-03	0	7.95E-02
	Trimethylbenzene	0	0	0	0.38	0	0	3.79E-01
	Toluene	1.44E-04	0	0	0	5.96E-06	0.17	1.74E-01
	Xylene	0	0	0	2.48	0	0.35	2.83E+00
	Cadmium	4.67E-05	0	0	0	1.93E-06	0	4.86E-05
	Chromium	5.94E-05	0	0	0	2.45E-06	0	6.19E-05
	Lead	2.12E-05	0	0	0	8.76E-07	0	2.21E-05
	Manganese	1.61E-05	0	0	0	6.66E-07	0	1.68E-05
	Nickel	8.91E-05	0	0	0	3.68E-06	0	9.28E-05
	Totals	**0.080**	**0**	**0**	**3.428**	**0.003**	**0.524**	**4.035**
							Worse Case HAP	**2.833**

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)								
		Emissions Generating Activity						
		Existing Emission Units				New Emission Units		
Category	Pollutant	Combustion	Storage	Mixing Line #1	SBF	Combustion	Mixing Line #2	**TOTAL**
Criteria	PM	0.07	0	3.29	0.00	0.00	0.30	3.67
Pollutants	PM10	0.08	0	3.29	0.00	0.01	0.30	3.68
	SO2	0.03	0	0	0.00	0.00	0	0.03
	NOx	4.24	0	0	0.00	0.18	0	4.42
	VOC	0.23	0.15	55.35	5.59	0.01	8.63	69.96
	CO	3.57	0	0	0.00	0.15	0	3.71
Hazardous	Benzene	8.91E-05	0	0	0	3.68E-06	0	9.28E-05
Air	Dichlorobenzene	5.09E-05	0	0	0	2.10E-06	0	5.30E-05
	Ethylbenzene	0	0	0	0.57	0	0	5.65E-01
Pollutants	Formaldehyde	3.18E-03	0	0	0	1.31E-04	0	3.31E-03
	Hexane	7.64E-02	0	0	0	3.15E-03	0	7.95E-02
	Trimethylbenzene	0	0	0	0.38	0	0	3.79E-01
	Toluene	1.44E-04	0	0	0	5.96E-06	0.17	1.74E-01
	Xylene	0	0	0	2.48	0	0.35	2.83E+00
	Cadmium	4.67E-05	0	0	0	1.93E-06	0	4.86E-05
	Chromium	5.94E-05	0	0	0	2.45E-06	0	6.19E-05
	Lead	2.12E-05	0	0	0	8.76E-07	0	2.21E-05
	Manganese	1.61E-05	0	0	0	6.66E-07	0	1.68E-05
	Nickel	8.91E-05	0	0	0	3.68E-06	0	9.28E-05
	Totals	**0.080**	**0**	**0**	**3.43**	**0.003**	**0.52**	**4.035**
							Worse Case HAP	**2.833**

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
Potential to Emit Summary (Entire Source)

Company Name: NCP Coatings, Inc.
Address: 1413 Clover Road,
Mishawaka, Indiana 46545
MSOP Renewal: 141-24162-00196
Permit Revision No.: 141-25786-00196
Reviewer: Hannah L. Desrosiers
Date Received: 12/26/2007

Uncontrolled Potential Emissions (tons/year)

Pollutant	Mixer Added to Mix Line # 1	SBF	Combustion, Storage, and Mixing Line Equipment*	**TOTAL**
PM	12.4	0.00	40.4	**52.8**
PM10	12.4	0.00	40.4	**52.8**
SO2	0.00	0.00	Neg.	**0.00**
NOx	0.00	0.00	1.00	**1.00**
VOC	**	5.59	55.6	**61.1**
CO	0.00	0.00	0.84	**0.84**
total HAPs	0.00	3.43	15.0	**18.4**
worst case single HAP	0.00	2.48	5.39	**7.87**

Controlled Potential Emissions (tons/year)

Pollutant	Mixer Added to Mix Line # 1	SBF	Combustion, Storage, and Mixing Line Equipment*	**TOTAL**
PM	0.12	0.00	0.27	**0.39**
PM10	0.12	0.00	0.27	**0.39**
SO2	0.00	0.00	Neg.	**0.00**
NOx	0.00	0.00	1.00	**1.00**
VOC***	**	5.59	24.0	**29.6**
CO	0.00	0.00	0.84	**0.84**
total HAPs	0.00	3.43	15.0	**18.4**
worst case single HAP	0.00	2.48	5.39	**7.87**

* The calculations for the rest of the equipment (including combustion, storage, and mixing line equipment) located at this source are confidential as part of the original MSOP 141-15583-00196, issued on April 9, 2002.

** The PTE of VOC for this operation is included as part of the confidential calculations completed in the original MSOP 141-15583-00196, issued on April 9, 2002 and is included in the 61.1 tpy value of this table.

*** The usage of VOC containing material loaded to Mix Line #1 shall be limited to 1,600 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC emissions shall be limited to thirty (30) pounds

Appendix A: Emissions Calculations
Emission Summary

Company Name: NCP Coatings, Inc.
Address City IN Zip: 1413 Clover Road, Mishawaka, Indiana 46545
MSOP Renewal: 141-24162-00196
Permit Revision No.: 141-25786-00196
Reviewer: Hannah L. Desrosiers
Date Received: 12/26/2007

	Uncontrolled Potential Emissions (tons/year)			
	Emissions Generating Activity			
		New Emission Units		
Category	Pollutant	Natural Gas Combustion	Mixing Line #2	**TOTAL**
Criteria Pollutants	PM	0.003	0.30	0.30
	PM10	0.01	0.30	0.31
	SO2	0.001	0	0.001
	NOx	0.18	0	0.18
	VOC	0.01	8.63	8.64
	CO	0.15	0	0.15
Hazardous Air Pollutants	Benzene	3.68E-06	0	3.68E-06
	Dichlorobenzene	2.10E-06	0	2.10E-06
	Ethylbenzene	0	0	0
	Formaldehyde	1.31E-04	0	1.31E-04
	Hexane	3.15E-03	0	3.15E-03
	Trimethylbenzene	0	0	0
	Toluene	5.96E-06	0.17	1.74E-01
	Xylene	0	0.35	3.50E-01
	Cadmium	1.93E-06	0	1.93E-06
	Chromium	2.45E-06	0	2.45E-06
	Lead	8.76E-07	0	8.76E-07
	Manganese	6.66E-07	0	6.66E-07
	Nickel	3.68E-06	0	3.68E-06
	Totals	**0.003**	**0.524**	**0.527**
			Worse Case HAP	**0.350**

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)				
	Emissions Generating Activity			
		New Emission Units		
Category	Pollutant	Combustion	Mixing Line #2	**TOTAL**
Criteria Pollutants	PM	0.003	0.30	0.30
	PM10	0.01	0.30	0.31
	SO2	0.001	0	0.001
	NOx	0.18	0	0.18
	VOC	0.01	8.63	8.64
	CO	0.15	0	0.15
Hazardous Air Pollutants	Benzene	3.68E-06	0	3.68E-06
	Dichlorobenzene	2.10E-06	0	2.10E-06
	Ethylbenzene	0	0	0
	Formaldehyde	1.31E-04	0	1.31E-04
	Hexane	3.15E-03	0	3.15E-03
	Trimethylbenzene	0	0	0
	Toluene	5.96E-06	0.17	1.74E-01
	Xylene	0	0.35	3.50E-01
	Cadmium	1.93E-06	0	1.93E-06
	Chromium	2.45E-06	0	2.45E-06
	Lead	8.76E-07	0	8.76E-07
	Manganese	6.66E-07	0	6.66E-07
	Nickel	3.68E-06	0	3.68E-06
	Totals	**0.003**	**0.524**	**0.527**
			Worse Case HAP	**0.350**

Total emissions based on rated capacity at 8,760 hours/year.

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

Company Name: NCP Coatings, Inc.
Address City IN Zip: 1413 Clover Road, Mishawaka, Indiana 46545
MSOP Renewal: 141-24162-00196
Permit Revision No.: 141-25786-00196
Reviewer: Hannah L. Desrosiers
Date: 12/26/2007

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.4	3.5

	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	0.003	0.013	0.001	0.175	0.010	0.147

*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

	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	3.679E-06	2.102E-06	1.314E-04	3.154E-03	5.957E-06

	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	8.760E-07	1.927E-06	2.453E-06	6.658E-07	3.679E-06

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

Total Haps	**0.003**	**tons/yr**

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

Appendix A: Emissions Calculations
Particulate and Volitile Organic Compound (VOC) Emissions
Stain Production (Line #2)

Company Name: NCP Coatings, Inc.
Address City IN Zip: 1413 Clover Road, Mishawaka, Indiana 46545
MSOP Renewal: 141-24162-00196
Permit Revision No.: 141-25786-00196
Reviewer: Hannah L. Desrosiers
Date: 12/26/2007

Stain Production

VOC

Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)
Stain	30	77.714	100.00%	1.2	5.1
Topcoat	30	25.567	100.00%	0.38	1.7
Sealer	30	1.178	100.00%	0.02	0.1
	Total:	104.459			**6.9**

HAPs

Facility Group	Max. Weight % Xylene	Max. Weight % Toluene	Max. Weight % Total HAPs	EF (lb/ton)	PTE Xylene (tons/yr)	PTE Toluene (tons/yr)	PTE Total HAPs (tons/yr)
Stain	0.0%	0.0%	0.0%	30	0.00	0.00	0.00
Topcoat	19.9%	9.9%	30.0%	30	0.33	0.17	0.50
Sealer	19.9%	9.9%	30.0%	30	0.02	0.01	0.02
				Totals:	**0.350**	**0.174**	**0.524**

PM and PM-10

Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % Solids	PTE (lbs/hr)	PTE (tons/yr)
Stain	20	77.714	6.33%	0.05	0.2
Topcoat	20	25.567	6.60%	0.02	0.07
Sealer	20	1.178	14.40%	0.00	0.01
				Total:	**0.297**

Emission Factors from AP-42, Chapter 6.4, Table 6.4-1 and Fire 6.2

Cleanup Solvents

	Usage (lbs/2040 hrs)	Potential Usage (lbs/hr)	Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)
Non-HAP solvent (VMP Naphtha)	822.5	0.40	100.00%	0.40	1.77
				Total:	**1.77**

VOC Total:	**8.63**
HAP Total:	**0.52**
PM/PM10 Total:	**0.30**

METHODOLOGY

Paint Production
PTE VOC (lbs/hr) = Capacity (lbs/hr) * Weight % Organics * (EF (lb/ton) / 2000 lbs/ton)
PTE VOC (tons/yr) = PTE VOC (lbs/hr) * 8,760 hrs/yr / 2000 lbs/ton
PTE PM (lbs/hr) = Capacity (lbs/hr) * Weight % Solids * (EF (lb/ton) / 2000 lbs/ton)
PTE PM (tons/yr) = PTE PM (lbs/hr) * 8,760 hrs/yr / 2000 lbs/ton
PTE (lbs/day) = (Usage (lbs/2040 hrs) / 2040 hrs) * Weight % VOC
PTE (tons/yr) = PTE (lbs/day) * 8760 hrs/yr /2000 lbs/ton

Appendix A: Emissions Calculations
326 IAC 6-3-2 Particulate Emission Limitations
Stain Production (Line #2)

Company Name: NCP Coatings, Inc.
Address City IN Zip: 1413 Clover Road, Mishawaka, Indiana 46545
MSOP Renewal: 141-24162-00196
Permit Revision No.: 141-25786-00196
Reviewer: Hannah L. Desrosiers
Date: 12/26/2007

Unit	ID	Number of Units	Process Weight Rate, each (lbs/hr)	Process Weight Rate, each (tons/hr)	Allowable Emissions (E), each (lbs/hr)
air-powered mixers (drum and pail)	DM1, DM2, PM1-PM4	6	104.5	0.052	**0.567**

Methodology
Process Weight Rate = Maximum Throughput Capacity
Process Weight Rate, each (tons/hr) = Process Weight Rate, each (lbs/hr) / 2000 lbs/ton
Allowable Emissions (E), each (lbs/hr) = $4.10\ P^{0.67}$