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: October 8, 2008

RE: Independent Protection Company, Inc. / 039-26080-00448

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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(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
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Ms. Janet Kercher-Dudley
Independent Protection Company, Inc.
Turtle Top Division: 67819 State Road 15
New Paris, Indiana, 46553

October 8, 2008

Re: 039-26080-00448
First Significant Revision to
F039-10339-00448

Dear Ms. Kercher-Dudley:

Independent Protection Co., Inc. was issued a Federally Enforceable State Operating Permit (FESOP) No. F039-10339-00448 on May 13, 2004 for a stationary specialty van/transport manufacturing source located at 67819 State Road 15, New Paris, Indiana, 46553. On February 11, 2008, the Office of Air Quality (OAQ) received an application from the source relating to the replacement of paint shop operation, identified as (P1) and touch up paint booth identified as (P4), and removal of seven (7) natural gas space heaters, destroyed in the fires of 2006, and 2007. The source has requested the construction and operation of a new paint shop with four paint booths PB1, P4, PB2, PB3, and addition of thirteen new space heaters of combined heat input capacity of 10.535 MMBtu per hour. Additionally, the source has requested to increase the process throughput to their existing (P5) and (P6) gluing operations using new adhesives, and decrease in process throughput of wood in wood working operation. The potential to emit criteria pollutants and hazardous pollutants will continue to be limited to less than the TV and/or PSD major threshold levels. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

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

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the 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 Swarna Prabha, of my staff, at 317-234-5376 or 1-800-451-6027, and ask for extension 45376.

Sincerely/Original Signed By:

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document, Appendix A - emission calculations, and revised permit

IC /SP

cc: File - Elkhart County
Elkhart 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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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Independent Protection Company, Inc.
Turtle Top Division: 67819 State Road 15
New Paris, Indiana 46553

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and 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. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.:F039-10339-00448	
Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 13, 2004 Expiration Date: May 13, 2009

First Administrative Amendment No.: 039-19724-00448, issued on August 13, 2004

Significant Permit Revision No.:039-26080-00448	Pages Revised: Entire Permit
Issued by/Original Signed By: Iryn Calilung, Section Chief Office of Air Quality	Issuance Date: October 8, 2008 Expiration date: May 13, 2009

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, A.3, and A.4 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 specialty van/transport manufacturing source.

Source Address:	67819 State Road 15, New Paris, IN 46553
Mailing Address:	67819 State Road 15, New Paris, IN 46553
General Source Phone:	(574) 831-4340
SIC Code:	3713
Source Location Status:	Elkhart Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

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) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausts through stack S1A & B.

(b) One (1) paint touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 vehicles per hour, and exhausting through S4.

(c) One (1) frame painting booth in building #9, approved for construction in 2008, identified as PB2, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray guns, wiping and dipping as methods of application, equipped with forty eight dry filters, and exhausting through stack S6.

(d) One (1) undercoating pit booth in building #9, approved for construction in 2008, identified as PB3, with a maximum capacity of 0.65 vehicles per hour, utilizing an airless spray gun as method of application, equipped with a dry filter, and exhausting through stack S7.

(e) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.29 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

(f) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.36 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

(g) One (1) surface preparation operation consisting of polishing, buffing, surface grinding and sanding using handheld equipment in building #5, constructed in 2007, identified as SP, with a maximum capacity of 0.65 vehicle units per hour at a process weight rate of 3.38 tons per hour, equipped with two downdraft cartridge filters, C3 and C5, for particulate control, and exhausting through stacks S3 and S5.

(h) One (1) woodworking operation, constructed in 1978, identified as P2, controlled by two cyclones, C-2A and C-2B, each with an air flow rate of less than 4,000 acfm, operating at a process weight rate of 700 pounds of wood per hour, and exhausting to stacks S2A and S2B, respectively.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each;

(1) Twenty eight (28) space heaters, with a total heat input of 4.387 MMBtu per hour.

(2) Thirteen (13) natural gas-fired space heaters and air make-up units, constructed in 2007, with a total heat input capacity of 10.535 MMBtu per hour, exhausting outdoors.

(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;

(d) Packaging lubricants and greases;

(e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(f) Cleaners and solvents characterized as having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20^{o}C (68^{o}F);

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6[326 IAC 8-3-2] [326 IAC 8-3-5];

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(e)];

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

(j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(l) Paved and unpaved roads and parking lots with public access;

(m) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;

(n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(o) Filter or coalescer media changeout;

(p) Welding of specialty van and truck assembly components;

(q) One (1) band saw operation, approved for construction in 2008, identified as band saw, to cross cut 1" x 1" and 1" x 2" 14 gauge steel tubing, with a capacity of 48 feet of 1" tubing cut per hour and 63 pounds per hour of raw material.

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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.

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

(a) This permit, F039-10339-00448 is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 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.6 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.7 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.8 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.9 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.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

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

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

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

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does 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.13 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 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) 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

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

B.14 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 Provision), 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.15 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 FESOP 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.16 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.17 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.18 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 emissions allowable under 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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes 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 in 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.

B.19 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.20 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.21 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.22 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, I/M & Billing Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.3 and A.4.

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

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions 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), and 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. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(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) 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.

(c) 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 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

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

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

(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. 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 inability to meet this date.

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

Unless otherwise specified in the approval for the new emissions unit, 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.

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

C.13 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.14 Response to Excursions or Exceedences [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;

(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.15 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 and 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source 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 IAC2-1.1-1(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 Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be 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.18 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.

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SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausting through stack S1A & B.

(b) One (1) paint shop touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 Vehicles per hour, and exhausting through S4.

(c) One (1) frame painting booth in building #9, approved for construction in 2008, identified as PB2, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray guns, wiping and dipping as methods of application, equipped with forty eight dry filters, and exhausting through stack S6.

(d) One (1) undercoating pit booth in building #9, approved for construction in 2008, identified as PB3, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray gun as method of application, equipped with a dry filter, and exhausting through stack S7.

(e) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.29 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

(f) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.36 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Pursuant to [326 IAC 2-8-4] the total VOC usage at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation, P5 and turtle top glue operation, P6 including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

Compliance with this limitation shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

(a) Pursuant to [326 IAC 2-8-4] the total usage of any single hazardous air pollutant (HAP) at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation, P5 and turtle top glue operation, P6 shall be limited to less than 9.9 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) Pursuant to [326 IAC 2-8-4] the total usage of all hazardous air pollutants (HAPs) at the paint shop spray booth - PB1, P4, PB2, PB3, terra glue operation, P5 and turtle top glue operation, P6 shall be limited to less than 24.9 tons per twelve (12) consecutive month period. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

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

(a) Pursuant to 326 IAC 8-2-99(d)(2) (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating delivered to the applicator at the paint shop operation- PB1, P4, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air dried coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating input at the frame primer coating booth- PB2 shall be limited to 3.5 pounds of VOC per gallon of coating less water, as delivered to the applicator for any calendar day.

D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.5 Particulate Control

Pursuant to 326 IAC 6-3-2(d), particulate from the paint shop spray booths - PB1, P4, PB2, PB3, and two (2) glue operations P5, and P6 shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 and D.1.3(b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limits in Condition D.1.3(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^{n}(C_i \times U_i)}{\sum_{i=1}^{n} U_i}$$

where: A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;

C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;

U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and

n is the number of coatings being averaged

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.3(a), then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

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

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth PB1 stacks S1A & B, Booth P4 stack S4, Booth PB2 stack S6, and Booth PB3 stack S7, while respective booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C-Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks, S1A & B, S4, S6, S7, and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, and D.1.2 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and HAP emission limits established in Conditions D.1.1, and D.1.2 . Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount, and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and

amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The total VOC usage for each month;

(4) The total individual and combined HAP usage for each month;

(5) The weight of VOCs emitted for each compliance period; and

(6) The weight of total individual and combined HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.3(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.3(a).

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

(2) The coating material and solvent less water used on daily basis;

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

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

(3) The volume weighted average VOC content of the coatings used for each coating;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

(6) If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limit contained in Condition D.1.3(a), then the Permittee shall not be required to maintain records identified in paragraphs (3), (4) and (5) above on that day."

(d) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, once per day and monthly inspections.

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

D.1.11 Reporting Requirements

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

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ECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(g) One (1) surface preparation operation consisting of polishing, buffing, surface grinding and sanding using handheld equipment in building #5, constructed in 2007, identified as SP, with a maximum capacity of 0.65 vehicle units per hour at a process weight rate of 3.38 tons per hour, equipped with two downdraft dry filters, C3 and C5 for particulate control, and exhausting through stacks S3 and S5.

(h) One (1) woodworking operation, constructed in 1978, identified as P2, controlled by two cyclones, C-2A and C-2B, each with an airflow rate of less than 4,000 acfm, operating at a process weight rate of 700 pounds of wood per hour, and exhausting through stacks S2A and S2B, respectively.

(The information describing the process contained in this facility 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 [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from surface preparation operation, identified as SP, shall not exceed 9.27 pounds per hour when operating at a process weight rate of 3.38 tons per hour.

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 2.03 pounds per hour when operating at a process weight rate of 700 pounds of wood per hour.

The pounds per hour limitation was calculated with the following equation for conditions (a) and (b):

Interpolation of the data for the process weight rate up to 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 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Particulate Control

(a) In order to comply with condition D.2.1(a), the dry filters for particulate control shall be in operation and control emissions from the surface preparation facility (SP) at all times that the surface preparation facility is in operation.

(b) In order to comply with condition D.2.1(b), the cyclones for particulate control shall be in operation and control emissions from the woodworking facility (P2) at all times that the woodworking facility is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

(a) Daily visible emission notations of wood working operation P2, and surface prep SP, stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. 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.2.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

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

D.2.6 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the wood working operation P2, stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).

(b) 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: Independent Protection Company, Inc.
Source Address: Turtle Top Division: 67819 State Road 15, New Paris, IN 46553
Mailing Address: 67819 State Road 15, New Paris, IN 46553
FESOP No.: F039-10339-00448

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
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Independent Protection Company, Inc.
Source Address: Turtle Top Division: 67819 State Road 15, New Paris, IN 46553
Mailing Address: 67819 State Road 15, New Paris, IN 46553
FESOP No.: F039-10339-00448

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

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

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

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

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

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

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report (I)

Source Name: Independent Protection Company, Inc.
Source Address: Turtle Top Division: 67819 State Road 15, New Paris, IN 46553
Mailing Address: 67819 State Road 15, New Paris, IN 46553
FESOP No.: F039-10339-00448
Facility: paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation**,** P5 and turtle top glue operation**,** P6

Parameter: VOC, single and combined HAPs usages

Limit:
(a) total VOC usage at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation, P5 and turtle top glue operation, P6, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.0 tons per twelve (12) consecutive month period

(b) total usage of any single hazardous air pollutant (HAP) at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation, P5 and turtle top glue operation, P6 shall be limited to less than 9.9 tons per twelve (12) consecutive month period

(c) combined usage of all hazardous air pollutants (HAPs) at the paint shop spray booths **-** PB1, P4, PB2, PB3, terra glue operation, P5 and turtle top glue operation, P6 shall be limited to less than 24.9 tons per twelve (12) consecutive month period

YEAR:

Month	Total Input Usage This Month (tons)			Total Input Usage Previous 11 Months (tons)			Total 12-Month Input Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

*List the single HAP with the greatest emission rate

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Independent Protection Company, Inc.
Source Address: Turtle Top Division: 67819 State Road 15, New Paris, IN 46553
Mailing Address: 67819 State Road 15, New Paris, IN 46553
FESOP No.: F039-10339-00448

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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 ○No 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

Addendum to the Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Independent Protection Company, Inc., Turtle Top Division
Source Location:	67819 State Road 15, New Paris, IN 46553
County:	Elkhart
SIC Code:	3713
FESOP No.:	F 039-10339-00448
First Significant Permit Revision No.:	039-26080-00448
Permit Reviewer:	Swarna Prabha

On August 19, 2008, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in Greensburg Daily News, Greensburg, Indiana, stating that Independent Protection Company, Inc., Turtle Top Division had applied for a significant permit revision to a Federally Enforceable State Operating (FESOP) Permit. Also, the Public Notice was sent to Porter Charpie Public Library, located at 68080 County Road 23, in New Paris to be posted. On August 29, 2008, the applicant notified IDEM, that they are not aware of any public library in New Paris and will send an updated application package to Goshen Public Library, located at 601 South 5th Street, Goshen, IN 46526. On September 4, 2008, the Office of Air Quality had a corrected notice republished in Greensburg Daily News, Greensburg, Indiana, relating to the construction and operation of a new paint shop consisting of four paint booths PB1, P4, PB2, PB3, and thirteen new natural gas space heaters, within their existing facility that got destroyed in the fires of 2006 and 2007. Additionally, the source has requested the removal of seven (7) natural gas space heaters, and increase in the process throughput to their existing gluing operations P5 and P6. The notice also stated that the OAQ proposed to issue a FESOP SPR for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

NOTE: The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes.

On September 8, 2008, Gregory W. Clark, an environmental consultant, on behalf of Independent Protection Company, Inc., Turtle Top Division, submitted comments to IDEM, OAQ on the draft FESOP SPR. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Please change the word "bus" to "vehicles" to more accurately describe the units being processed through P4 and to be consistent with the unit description used in describing the maximum capacity of other painting booths at the facility.

Response to Comment 1:

As requested by the Permittee, the facility description in Section A.2(b) and Section D.1(b) of the permit has been revised as follows:

...

(b) One (1) paint touch up booth in building #5, constructed in 2007, identified as P4, with a

maximum capacity of 0.65 ~~bus~~ **vehicles** per hour, and exhausting through S4.

...

Comment 2:

The source requests to change the limit on PB2 from 3 pounds of VOC per gallon of coating less water "to 3.5 pounds of VOC per gallon of coating less water" to be consistent with the acceptable limit required by 326 IAC 8-2-9 (d) (2).

Response to Comment 2:

As requested by the Permittee, the VOC emission limit in Section D.1.3 (b) for Paint Booth PB2 has been changed to "3.5 pounds of VOC per gallon of coating less water", because the coating application system is air dried or forced air dried at temperatures up to one hundred ninety-four degrees Fahrenheit which is consistent with the applicable limit required by 326 IAC 8-2-9 (d) (2).

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

...

(b) Pursuant to 326 IAC 8-2-9**(d)(2)** (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating input at the frame primer coating booth-PB2 shall be limited to ~~3.0~~ **3.5** pounds of VOC per gallon of coating less water, as delivered to the applicator for any calendar day.

...

Comment 3:

The first and last paragraph contain references" Condition D.1.4(a)" which should be corrected to “Condition D.1.3(a)”.

Response to Comment 3:

As requested by the Permittee, in Section D.1.8 and Section D.1.10(b)**,** the references to Condition D.1.4(a) have been corrected to D.1.3(a).

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limits in Condition ~~D.1.4(a)~~ **D.1.3(a)** shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis.

...

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contain in Condition ~~D.1.4(a)~~ **D.1.3(a),** then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

D.1.10 Record Keeping Requirements

...

(b) To document compliance with Condition ~~D.1.4(a)~~ **D.1.3(a),** the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition ~~D.1.4(a)~~ **D.1.3(a).**

...

Comment 4:

Condition D1.9(a) requires weekly observations for overspray from “surface coating booth stack S1”. This language is from the old permit. There is no stack S1 described in this permit revision. Please clarify which coating booth (PB1, P4, PB2, or PB3) and stack is to be observed.

Response to Comment 4:

As requested by the Permittee, in Section D.1.9, the stack identification has been corrected for each booth.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth**s, PB1** stack**s** ~~S1~~ **S1A & B**, **Booth P4 stack S4**, **Booth PB2 stack S6 and Booth PB3 stack S7,** while ~~the~~ **respective** booth**s** ~~is~~ **are** in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C- Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack**s**, **S1A & B, S4, S6, S7,** and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Comment 5:

Conditions D.1.10, and D.2.6 Indiana regulation 326 IAC 2-8-16 is sited as the reference for the Record Keeping and Reporting Requirements. 326 IAC 2-8-16 refers to permit fees and is not applicable to Conditions D.1.10 and D.2.6. Please delete or correct this reference.

Response to Comment 5:

The Indiana state regulation citation 326 IAC 2-8-16 from Section D.1.10 and Section D.2.6 has been removed from Record keeping and reporting requirements.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] **~~[326 IAC 2-8-16]~~**

Comment 6:

D.1.10(b)(3), (4) and (5): Indiana regulation 326 IAC 8-1-2(a)(7) requires records of daily usage of gallons solids coating and VOC content of each coating and solvent and daily emissions in pounds VOC to calculate the daily volume weighted average of all coatings applied. If such records are not maintained, then each coating and solvent used must comply with 326 IAC 8-2-9. In other words, Indiana regulation 326 IAC 8-1-2(a)(7) does not require daily records of solvent and VOC usage, if each coating used has a VOC content of less than 3.5 pounds per gallon.

As phrased, permit Conditions D.1.10(b)(3), (4) and (5): require daily records of solvent usage and VOC usage even when all the coatings used have a VOC content of less than 3.5 pounds per gallon. This is excessive and beyond the requirement Indiana regulation 326 IAC 8-1-2(a)(7). IPC respectfully requests the following or similar language be inserted in place of D.1.10(b)(3), (4) and (5) to be consistent with the requirements of Indiana regulation 326 IAC 8-1-2(a)(7).

(3) The volume weighted average VOC content of the coatings used for each coating;

(4) The cleanup solvent usage for each day; and

(5) The total VOC usage for each day.

(6) If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limit contained in Condition D.1.3(a), then the Permittee shall not be required to maintain records identified in paragraphs (3), (4) and (5) above on that day."

Response to Comment 6:

As requested by the Permittee, the Section D.1.10(b) and subsections (3), (4), (5) and (6) have been revised as follows:

D.1.10 Record Keeping Requirements

...

(b) To document compliance with Condition D.1.3(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.3(a).

~~(3) The volume weighted average VOC content of the coatings used for each day. If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limit contained in Condition D.1.4(a), then the Permittee shall not be required to maintain records of the volume weighted average VOC content of the coatings used in that operation on that day;~~

~~(4) The cleanup solvent usage for each day; and~~

~~(5) The total VOC usage for each day.~~

(3) The volume weighted average VOC content of the coatings used for each coating;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

(6) If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limit contained in Condition D.1.3(a), then the Permittee shall not be required to maintain records identified in paragraphs (3), (4) and (5) above on that day."

...

Comment 7:

Condition D.1.10(d): The reference to "Condition D1.10" should be corrected to "Condition D1.9".

Response to Comment 7:

As requested by the Permittee, in Section D.1.10(d), the reference to Condition D.1.10 has been corrected to Condition D.1.9.

D.1.10 Record Keeping Requirements

...

(d) To document compliance with Condition ~~D.1.10~~ **D.1.9**, the Permittee shall maintain a log of weekly overspray observations, once per day and monthly inspections.

...

Additional Changes:

The Compliance Determination Requirement for frame primer coating booth PB2 as specified in Section D.1.3(b) in FESOP Significant Permit Revision No. 039-26080-00448 was inadvertently left out. The Condition D.1.3(b) has been added to the Compliance Determination Requirements.

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 **and D.1.3(b)** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data

sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

IDEM Contact

Question regarding this permit can be directed to Ms. Swarna Prabha the Indiana Department of Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 6153 IGCN 1003, Indianapolis, In 46204-2251 or by telephone at 317-234-5376 or toll free at 1-800-452-6027 extension 4-5376.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant permit Revision to a Federal Enforceable State Operating Permit (FESOP).

Source Description and Location

Source Name:	**Independent Protection Company, Inc**
Source Location:	**Turtle Top Division: 67819 State Road 15, New Paris, IN 46553**
County:	**Elkhart**
SIC Code:	**3713**
Operation Permit No.:	**F039-10339-00448**
Operational Permit Issuance Date:	**May 13, 2004**
Significant Permit Revision No.:	**039-26080-00448**
Permit Reviewer:	**Swarna Prabha**

On February 11, 2008, the Office of Air Quality (OAQ) has received an application from Independent Protection Co., Inc., Turtle Top Division, related to a modification to an existing plant.

Existing Approvals

The source was issued FESOP No. 039-10339-00448 on May 13, 2004. The source has since received the following approval:

Administrative Amendment No. 039-19724-00448, issued on August 13, 2004

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Attainment effective July 19, 2007, 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]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
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, 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 the ozone standards. Elkhart County has been designated as attainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Elkhart 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 15, 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
Elkhart 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.

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 or 326 IAC 2-7, and since there is no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

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Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification based on FESOP No. 039-10339-00448 after consideration of all enforceable limits established in the effective permits:

	Potential To Emit (tons/year)							
Process/emission unit	PM	PM10*	SO_2	VOC	CO	NO_x	HAPs	
Paint shop spray booths (PB1, P4, PB2, PB3, P5 and P6)	61.01	61.01	0.00	< 99.78(1)	0.00	0.00	single HAP <10 Total HAPs <25	
Natural Gas combustion	0.04	0.17	0.01	0.12	1.91	2.27	Single HAP negl. Total HAPs negl.	
Welding operation	2.23	2.23	0.0	0.0	0.0	0.0	Negl.	
Woodworking operation	36.48(2)	36.48(2)	0.0	0.0	0.0	0.0	Single HAP negl. Total HAPs negl.	
Total	99.76	99.89	0.01	< 99.90	1.91	2.27	Single HAP <10 Total HAPs < 25	
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
There is no PM2.5 Emission Factor in AP-42, PM10 = PM2.5
negl.=negligible
(1) Based on 326 IAC 2-8-4 (FESOP) limitations.
(2) Allowable PTE

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) These emissions are based upon FESOP No. 039-10339-00048, Appendix A of TSD issued on May 13, 2004.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed a significant permit revision application, submitted by Independent Protection Co., Inc., on February 11, 2008, relating to a specialty van/transport manufacturing plant. The following is a list of the proposed emission units and pollution control devices that replaced the existing paint shop spray booths which consists of PB1, paint touch up booth P4, frame painting booth PB2, and undercoating pit booth PB3, destroyed in the fires of 2006 and 2007, and increase in the process throughout to their existing P5 and P6 gluing operations, the use of new coatings and adhesives. Additionally, the source has requested the addition of thirteen (13) natural gas space heaters, and new band saw operation to cut metal tubing. Finally, the source has modified surface preparation operation, identified as SP, which includes grinding, polishing and buffing process, and also, reduced the process weight rate of

wood in the wood working operation.

The following is a list of unpermitted emission units and control devices:

(a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausting through stack S1A & B.

(b) One (1) paint shop touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 vehicles per hour, and exhausting through S4.

NOTE: The booths that replaced the existing booths will use the same unit ID.

The following is a list of emission units and control devices:

(c) One (1) frame painting booth in building #9, approved for construction in 2008, identified as PB2, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray guns, wiping and dipping as methods of application, equipped with forty eight dry filters, and exhausting through stack S6.

(d) One (1) undercoating pit booth in building #9, approved for construction in 2008, identified as PB3, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray gun, as method of application, equipped with a dry filter, and exhausting through stack S7.

(e) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.29 units per hour, utilizing air atomization gun equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

(f) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.36 units per hour, utilizing air atomization gun equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

(g) One (1) surface preparation operation consisting of polishing, buffing, surface grinding and sanding using handheld equipment in building #5, constructed in 2007, identified as SP, with a maximum capacity of 0.65 vehicle units per hour at a material process weight rate of 3.38 tons per hour, equipped with two down draft cartridge filters; C3, and C5, for particulate control, and exhausting through stacks S3 and S5.

(h) One (1) woodworking operation, constructed in 1978, identified as P2, controlled by two cyclones, C-2A and C-2B, each with an air flow rate of less than 4,000acfm, operating at a process weight rate of 700 pounds of wood per hour, and exhausting through stacks S2A and S2B, respectively.

Following is a list of new insignificant activities:

(i) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each;

(1) Thirteen (13) natural gas-fired space heaters and air make-up units, constructed in 2007, combined heat input capacity of 10.535 MMBtu per hour, exhausting outdoors.

(j) One (1) band saw operation, approved for construction in 2008, identified as band saw, to cross cut 1" x 1" and 1" x 2" 14 gauge steel tubing, with a capacity of 48 feet of 1" tubing cut per hour and 63 pounds per hour of raw material.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

	Potential to Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
Process/Emission Unit	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Paint shop spray booths and glue operations (PB1, P4, PB2, PB3-new) , and P5 and P6- Revised	63.88	63.88	-	-	154.4	-	62.86	16.6 (Toluene)
(1) Surface Preparation (SP) -new	21.36(1)	21.36	-	-	-	-	negl.	negl.
Woodworking operation (P2) (Revised)	8.9(2)	8.9(2)	0.0	0.0	0.0	0.0	0.0	negl.-HAPs
Band Saw Operation -new	0.01	0.01	-	-	-	-	-	-
(13) Natural Gas Space Heaters-new	0.09	0.35	0.03	3.18	0.25	3.87	.086	.083 (Hexane)
Total PTE of Proposed Revision	94.24	94.50	0.03	3.18	154.65	3.87	62.95	30.5 (Toluene)

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
There is no PM 2.5 Emission Factor in AP-42, PM10 = PM2.5
negl. = negligible
(1) Emissions were overlooked and not included in the FESOP No. 039-10339-00448
(2) Allowable PTE

(a) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

(b) This FESOP is being revised through a FESOP Significant Permit revision pursuant to 326 IAC 2-8-11.1(g)(3), even though the units that are being constructed are similar to existing permitted units, this modification changes existing requirements for the units or process under the emission caps (see PTE of the entire source after the issuance of the FESOP Revision Section).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10*	SO_2	VOC	CO	NOx	Total HAPs	Worst Single HAP
Paint shop spray booths and glue operation (PB1, P4, PB2, PB3, P5 and P6)	61.01	61.01	0.0	~~<99.78~~[(1)] **<99.0**[(1)]	**0.0**	0.0	**<24.9**[(1)]	<9.9[(1)] (Toluene)
Surface Preparation (SP)	**21.36**	**21.36**	**0.0**	**0.0**	**0.0**	**0.0**	negl.	negl.
Woodworking operation (P2)	~~36.48~~[(2)] **8.9**[(2)]	~~36.48~~[(2)] **8.9**[(2)]	0.0	0.0	0.0	0.0	negl.	negl.
Welding operation	2.23	2.23	0.0	0.0	0.0	0.0	negl.	negl.
Insignificant Activities								
Band Saw Operation	0.01	0.01	0.0	0.0	0.0	0.0	negl.	negl.
~~(35) Natural Gas Space Heaters~~ (28) Natural gas Space Heaters (Revised)	~~0.04~~ **0.04**	~~0.17~~ **0.15**	~~0.01~~ **0.01**	~~2.27~~ **0.11**	~~0.12~~ **1.61**	~~1.91~~ **1.92**	negl.	negl.
(13) Natural Gas Space Heaters	**0.09**	**0.35**	**0.03**	**0.25**	**3.87**	**3.18**	0.086	0.086 (Hexane)
Total PTE of the Entire Source	**93.64**	**94.01**	**0.04**	**<99.36**	**5.48**	**5.1**	Less than 25	Less than 10
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions**.**
There is no PM2.5 Emission Factor in AP-42, PM10 = PM2.5
negl. = negligible
(1) Based on 326 IAC 2-8-4 (FESOP) Limitations.
(2) Allowable PTE

This revision to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

PTE of the Entire Source After Issuance of the FESOP Revision

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

	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
Process/Emission Unit	PM	PM10*	SO_2	VOC	CO	NOx	Total HAPs	Worst Single HAP
Paint shop spray booths and glue operation (PB1, P4, PB2, PB3, P5 and P6)	61.01	61.01	0.0	<99.0(1)	0.0	0.0	<24.9(1)	<9.9(1) (Toluene)
Surface Preparation (SP)	21.36	21.36	0.0	0.0	0.0	0.0	negl.	negl.
Woodworking operation (P2)	8.9(2)	8.9(2)	0.0	0.0	0.0	0.0	negl.	negl.
Welding operation	2.23	2.23	0.0	0.0	0.0	0.0	negl.	negl.
Insignificant Activities								
Band Saw Operation	0.01	0.01	0.0	0.0	0.0	0.0	negl.	negl.
(28) Natural gas Space Heaters	0.04	0.15	0.01	0.11	1.61	1.92	negl.	negl.
(13) Natural Gas Space Heaters	0.09	0.35	0.03	0.25	3.87	3.18	0.086	0.086 (Hexane)
Total PTE of the Entire Source	93.64	94.01	0.04	<99.36	5.48	5.10	Less than 25	Less than 10
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
There is no PM2.5 Emission Factor in AP-42, PM10 = PM2.5
negl. = negligible
(1) Based on 326 IAC 2-8-4 (FESOP) Limitations.
(2) Allowable PTE

After this revision, this source is still a minor source pursuant to the Part 70 Permit program.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) This requirements of 326 IAC 12 or 40 CFR 60, Subpart MM (60.390 through 60.398), Standards of Performance for the Automobile and Light Duty Truck surface Coating Operations are not included in the permit, because this source assembles bus/speciality vehicles (van/buses).

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981), because this source is not a major source of HAPs as defined in 40 CFR 63.2.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart PPPP, Surface Coating of Plastic Parts and Products (40 CFR Part 63.4480 - 63.4581), because the source is not a major source of HAPs as defined in 40 CFR 63.2.

(c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart IIII, Surface Coating of Automobiles and Light-Duty Trucks (40 CFR Part 63.3080 - 63.3176), because this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not surface coat automobiles or light duty trucks as defined by 63.3176. This source assembles specialty vehicles (vans/buses).

(d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR 63, 11169 Subpart HHHHHH, surface coating or paint stripping and miscellaneous surface coating operations at area source (40CFR Part 63.11169), because this source is not involved in the use of chemical strippers that contain methyl chloride (MeCl) in paint removal process, and the surface coating used at this source do not contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

(a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirments of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new/modified unit(s) is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(d) 326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

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

(1) 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.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings in a six (6) hour period 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.

(f) 326 IAC 2-8-4 (FESOP)
Pursuant to this rule the following condition shall apply to this specialty van/transport manufacturing source.

Particulate PM/PM_{10} Limitations:

Based on 8760 hours of operation at rated capacity of twelve (12) month period, the PM_{10} emissions from the woodworking operation shall be limited to 8.9 tons per year. Compliance with this limit shall limit the source-wide potential to emit of PM_{10} to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 are not applicable.

VOC Limitations:

(1) The input of VOCs to paint shop spray booths, PB1, Vehicle touch-up painting booth P4, frame painting booth PB2, undercoating pit area PB3, terra glue operation, P5, and turtle top glue operation, P6 plus the amount of VOCs used for clean-up solvents shall be limited to less than 99.0 tons per twelve (12) consecutive month period.

This input of VOCs limit is required to limit the source wide potential to emit of VOC to less than 100 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.

HAPs Limitations:

(1) The input of any single HAP to paint shop spray booths, PB1, Vehicle touch-up painting booth P4, frame painting booth PB2, undercoating pit area PB3, terra glue operation, P5, and turtle top glue operation, P6 plus the usage of any single HAP used for clean-up solvents shall be limited to less than 9.9 tons per twelve (12) consecutive month period.

(2) The input of any combination HAPs to paint shop spray booths, PB1, Vehicle touch-up painting booth P4, frame painting booth PB2, undercoating pit area PB3, terra glue operation, P5, and turtle top glue operation, P6 plus the usage of any combination of HAPs used for clean-up solvents shall be limited to less than 24.9 tons per twelve (12) consecutive month period.

These usage limits are required to limit the source wide potential to emit of any single HAP and any combination of HAPs to less than 10 tons and 25 tons, respectively, per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.

State Rule Applicability - Natural Gas space heaters

(g) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The natural gas-fired space heaters, air make-up units are each not subject to 326 IAC 6-2 as

they are not sources of indirect heating.

(h) 326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)
The space heaters are not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions of sulfer dioxide are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

State Rule Applicability - Paint shop spray booths PB1, P4, PB2, PB3, P5 and P6

(i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate emissions from the paint shop spray booths PB1, P4, PB2, pit area PB3, and glue operations P5, and P6 must be controlled by dry filters, waterwash, or an equivalent control device and the control device must be operated in accordance with manufacturer's specifications. The source shall operate the dry filters in accordance with manufacturer's specifications.

(j) 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)
Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls. See table below.

Unit ID	Date of Construction	Metal coating VOC emissions lbs/day	Metal coating 326 IAC 8-2-9 applicability July 1, 1990
Spray Booths- PB1and P4	2007	>15 lbs/day	yes
Frame Painting- PB2	2008	>15 lbs/day	yes
Under Coating Booth- PB3	2008	<15 lbs/day	no

(a) Pursuant to 8-2-1(a)(4) and 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 are applicable to the metal surface coating operations in the paint booths PB1, and P4, since these operations have the actual VOC emissions greater than fifteen (15) pounds per day before add-on controls, and since each of the operations include surface coating of metal parts or products under the Standard Industrial Classification Code of major group #37.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), for the metal coating operations in the the volatile organic compound (VOC) content of the coating delivered to the applicator in a coating application system at the spray booths PB1 and P4, shall be limited to 3.5 pounds of VOCs per gallon of coating less water that is air dried or forced warm air dried coatings.

Compliance with the VOC content limit in paint booths PB1 and P4, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water. This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^{n}(C_i \times U_i)}{\sum_{i=1}^{n} U_i}$$

Where:

A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;
C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;
U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as

applied; and
n is the number of coatings being averaged

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

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The table below summaries metal surface coating operations in the paint spray booths, PB1 and P4 combined. Based on the maximum usage information provided by the source, the volume weighted VOC content of the coatings is 3.08 pounds of VOC per gallon, which is less than 3.5 pounds per gallon, excluding water. Therefore, PB1 and P4 shall be able to comply with 326 8-2-9(d).

Unit ID/Metal surface Coating Material	VOC content of coatings	Maximum Paint usage	Maximum Paint usage	Volume-Weighted VOC content
PB1 and P4	lbs/gal (C)	gal/hr	gal/day (U)	lbs VOC/gal
Ready Mix 3.5 M6466	3.64	0.1808	1.4464	5.265
Ready Mix 3.5 FLNA40703M6466	3.62	0.3466	2.7728	10.038
3.5 System A3.5 Activator	3.4	0.1741	1.3928	4.736
Autoclear HS & LV Clearcoat	0.9	0.0657	0.5256	0.473
Autoclear HS & LV Hardner	0	0.0219	0.1752	0.000
Activ LV Std Thinner	2.73	0.0437	0.3496	0.954
Autocoat BT 300 Binder Q10RV	6.36	0.112	0.896	5.699
Standard Hardene	4.24	0.0112	0.0896	0.380
High Performance Reduce	7.35	0.0616	0.4928	3.622
Colorbuild 2.1/2.8 Black Primer	1.56	0.1439	1.1512	1.796
Colorbuild 2.1/2.8 Hardener	0	0.036	0.288	0.000
2.1/2.8 Primer Sealer Activator	2.82	0.0106	0.0848	0.239
2.1/2.8 Primer Surf Activator	0	0.0285	0.228	0.000
OTO Body Coat	0.51	0.1365	1.092	0.557
Total			10.9848	33.758
Volume Weighted Average PB1 and P4				3.08

(b) Pursuant to 8-2-1(a)(4) and 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 are applicable to the metal surface coating operation in the frame primer coating pit paint booth PB2, since coating operation has the actual VOC emissions greater than fifteen (15) pounds per day before add-on controls, and includes surface coating of metal parts. Based on the maximum usage information provided by the source, the VOC content of the coatings is 1.25 pounds of VOC per gallon, which is less than 3.0 pounds of VOC per gallon, excluding water. Therefore, PB2 shall be able to comply with 326 8-2-9(d).

(c) Pursuant to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), are not applicable to under coating pit area PB3, which was constructed after July 1, 1990, since actual and potential VOC emissions are less than fifteen (15) pounds per day.

(d) Pursuant to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the glue operations P5, and P6, were constructed in 1964, which was before the applicability date of January 1, 1980, therefore are not subject to the requirements of 326 IAC 8-2-9.

(k) 326 IAC 8-1-6 (New facilities; general reduction requirements)

(1) The requirements of 326 IAC 8-1-6 are not applicable to paint shop spray booths, PB1, P4, and PB2, since each of these operations are specifically regulated by IAC 8-2-9.

(2) PB3 is not subject to 326 IAC 8-1-6 because it has potential emissions of less than twenty-five (25) tons per year of VOC.

(3) The glue operations, P5 and P6 were constructed in 1964, which was before the applicability date of January 1, 1980, therefore are not subject to the requirements of 326 IAC 8-1-6.

State Rule Applicability - Surface Prep (SP)

(l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate from the surface preparation operation shall not exceed 9.27 pounds per hour, when operating at a maximum process weight rate of 3.38 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

Based on calculations, the control device is not needed to comply with this limit.

State Rule Applicability - Band saw Operation

(m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the Band saw operation is exempt from the requirement because the, potential emissions are less than five hundred fifty one thousandths (0.551) pound per hour.

State Rule Applicability – Degreasing

(n) 326 IAC 8-3-1 (Organic Solvent Degreasing Operations)
The requirements of 326 IAC 8-3-1 are not applicable to degreasing operations at this source, since degreasing is performed using hand application of solvents.

(o) 326 IAC 20-6-1 (Halogenated Solvent Cleaning)
This source is not subject to the requirements of the 326 IAC 20-6-1, since the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

Compliance Determination and Monitoring Requirements

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

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section

D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a sources failure to take the appropriate corrective actions within a specific time period.

Proposed Changes

The changes listed below have been made to FESOP No. 039-10339-00448. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(a) Section A.2 source definition of the permit is deleted because there is only one plant located at 67819 State Road 15, New Paris, Indiana 46553. Sections A.3, A.4 and A.5 are renumbered. Also, subsections of A.3 and A.4 are renumbered.

(b) Sections A.3, A .4, and section D.1 of the permit are revised to include the new and modified emission units and the respective requirements. The reporting forms of the permit are revised to include the paint booths PB1, P4, PB2 and pit area PB3.

IDEM, OAQ has decided to make the following additional revisions to the permit:

(c) IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (A.I.) in the permit document. Section A.1 is updated accordingly.

(d) All occurrences of IDEM's mailing addresses have been updated in the permit. Any occurrences of P.O. Box 6015 in the permit have been removed, any occurrences of the zip code 46206-6015 or 46204 have been revised to **46204-2251**, and all addresses have been revised to include a mail code (MC) as follows:

Asbestos Section:	**MC 61-52 IGCN 1003**
Compliance Branch:	**MC 61-53 IGCN 1003**
Permits Branch:	**MC 61-53 IGCN 1003**
Technical Support and Modeling Section:	**MC 61-50 IGCN 1003**

(e) Condition C.7(g) is revised to remove the statement that the requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable, since all conditions and requirements in a FESOP are federally enforceable.

(f) All occurrences of the Compliance Data Branch telephone and facsimile numbers are revised throughout the permit to 317-233-~~5674~~ **0178** and 317-233-~~5967~~ **6865**, respectively.

(g) All occurrences of "the authorized individual" are revised to "an authorized individual" throughout the permit.

(h) In Nonrule Policy Document No. AIR 007 NPD, revised September 6, 2002, a table is given as an example for how sources can submit annual compliance certifications. Condition B.11 Annual Compliance Certification is revised to remove “in letter form” so that it does not contradict the guidance.

(i) IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.12 Preventive Maintenance and has amended Condition B.13 – Emergency Provisions. In sections B.12 and B.13 paragraphs have been renumbered.

(j) For clarification purposes, Condition B.18 - Operational Flexibility has been revised.

(k) The original Condition B.19 has been renamed from “Permit Revision Requirement” to “Source Modification Requirement”, which is a more appropriate condition title.

(l) The phone number for the OAQ, Billing, Licensing, and Training Section (BLT) in Condition B.22 is revised to 317-233-**4230** ~~4320~~.

(m) IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. Section C.14 has been revised accordingly. The Section D conditions, D.1.8 that refer to this condition have been revised.

(n) PM_{10} Emission Limitation - IDEM believes that the requirement of 326 IAC 6-3-2(d) limits the PTE of surface coating booths under 3.84 tons per year using control efficiency of 75% of dry filters, and source to under 100 tons per year of PM and $PM_{10.}$ Therefore, condition D.1.3 is not necessary and is removed.

(o) Clarification of applicable requirements and permit language and correction of typographical errors as necessary.

(p) Revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective on June 12, 2002 and were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Original Condition C.1 – Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour has been revised to remove (a) which contained these requirements, and original Condition D.1.4 – Particulate Matter (PM) [40 CFR 52 Subpart P] which contained these requirements has been removed. Since the requirements of the 326 IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable, the statement from original Conditions C.1 (1) and D.1.4 and D.1.9 (b) have been removed.

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The permit is revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**.

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

The Permittee owns and operates a stationary specialty van/transport manufacturing plant.

~~Authorized Individual:~~ ~~Vice President~~
Source Address: 67819 State Road 15, New Paris, IN 46553
~~67895 Industrial Drive, New Paris, IN 46553~~

...

~~A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]~~

~~This specialty van/transport manufacturing company consists of two (2)~~ **one (1) plant**~~s~~:

~~(a) Plant 1 is located at 67819 State Road 15, New Paris, IN 46553. and~~

~~(b) Plant 2 is located at 67895 Industrial Drive, New Paris, IN 46553.~~

~~Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this FESOP.~~

A.~~3~~**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) paint shop operation, constructed in 1975, identified as P1, with a maximum capacity of 3.0 units per hour, utilizing high volume low pressure spray equipment, wiping and dipping as methods of application, equipped with dry filters for particulate control and exhausting to stack S1.~~

~~(b) One (1) vehicle touch-up painting operation, constructed in 1978, identified as P4, with a maximum capacity of 0.25 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.~~

(a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausting through stack S1A & B.

(b) One (1) paint shop touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 vehicles per hour, and exhausting through S4.

(c) One (1) frame painting pit booth in building #9, approved for construction in 2008, identified as PB2, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray gun as method of application, equipped with a dry filters, and exhausting through stack S7.

(d) One (1) undercoating pit area in building #9, approved for construction in 2008, identified as PB3, with a maximum capacity of 0.65 vehicles per hour, utilizing an airless spray gun as method of application, equipped with a dry filter, and exhausting through stack S7.

~~(c)~~ **(e)** One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of ~~0.25~~ **0.29** units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

~~(d)~~ **(f)** One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of ~~0.12~~ **0.36** units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

(g) One (1) surface preparation operation consisting of polishing, buffing, surface grinding and sanding using handheld equipment in building #5, constructed in 2007, identified as SP, with a maximum capacity of 0.65 vehicle units per hour at a process weight rate of 3.38 tons per hour, equipped with two downdraft cartridge filters, C3 and C5 for particulate control, and exhausting through stacks S3 and S5.

(~~e~~) (**h**) One (1) woodworking operation, constructed in 1978, identified as P2, **controlled by two cyclones, C-2A and C-2B, each with an air flow rate of less than 4,000acfm,** ~~with a flow rate of 2200 acfm~~**, operating at a process weight rate of 700 pounds of wood per hour**, ~~utilizing a cyclone rated at 90% efficiency for particulate control~~ and exhausting ~~to stack S2~~ **through stacks S2A and S2B, respectively.**

A.**4**3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

...

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour **each**;

(1) ~~Thirty Five (35)~~ **Twenty Eight (28)** space heaters, with a total heat input of ~~5.187~~ **4.387** MMBtu per hour.

(2) Thirteen (13) natural gas-fired space heaters and air make-up units, constructed in 2007, combined heat input capacity of 10.535 MMBtu per hour, exhausting outdoors.

...

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(e)];

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

(j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;

(k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(l) Paved and unpaved roads and parking lots with public access;

(m) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;

(n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(o) Filter or coalescer media changeout;

(p) Welding of specialty van and truck assembly components; and

(q) One (1) band saw operation, approved for construction in 2008, identified as band saw, to cross cut 1" x 1" and 1" x 2" 14 gauge steel tubing, with a capacity of 48 feet of 1" tubing cut per hour and 63 pounds per hour of raw material.

~~(o) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations;~~

A.~~5~~**4** FESOP Applicability [326 IAC 2-8-2]

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

...

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

(a) This permit**, F039-10339-00448,** is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date **of this permit**.

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

...

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

...

(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.**

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

...

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

...

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

...

B.12 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, t~~**T**he Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, ~~including the following information on each facility:~~ **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**

...

~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

(~~c~~**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 PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(~~d~~**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.13 Emergency Provisions [326 IAC 2-8-12]

...

(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:~~

(g) **(**~~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) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

...

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.

…

B.16 Permit Renewal [326 IAC 2-8-3(h)]

~~(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]~~

(b~~)(1)~~ A timely renewal application is one that is:

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

(2~~B~~) 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.

~~(2) If IDEM, OAQ upon receiving a timely and complete 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.~~

(c) ~~Right to Operate After Application for Renewal [326 IAC 2-8-9]~~
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.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

...

~~(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

....

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at **the** ~~this~~ 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:

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

…

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade **emissions** increases and decreases in ~~emissions in~~ **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).

...

B.19 Permit Revision **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.22 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]

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 **4230** (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

...

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour ~~[40 CFR 52 Subpart P]~~[326 IAC 6-3-2]

~~(1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed~~

~~0.551 pounds per hour.~~

~~(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), **and** 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.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

...

(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~~

...

C.14 ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~
Response to Excursions or Exceedences [326 IAC 2-8-4] [326 IAC 2-8-5]

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following~~

~~reasons:~~

~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~

~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~

~~(3) An automatic measurement was taken when the process was not operating.~~

~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~

~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

(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;

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

...

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be 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.**

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SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

~~(a) One (1) paint shop operation, constructed in 1975, identified as P1, with a maximum capacity of 3.0 units per hour, utilizing high volume low pressure spray equipment, wiping and dipping as methods of application, equipped with dry filters for particulate control and exhausting to stack S1.~~

~~(b) One (1) vehicle touch-up painting operation, constructed in 1978, identified as P4, with a maximum capacity of 0.25 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.~~

(a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausting through stack S1A & B.

(b) One (1) paint shop touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 bus per hour, and exhausting through S4.

(c) One (1) frame painting booth in building #9, approved for construction in 2008, identified as PB2, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray guns, wiping and dipping as methods of application, equipped with forty eight dry filters, and exhausting through stack S6.

(d) One (1) undercoating pit booth in building #9, approved for construction in 2008, identified as PB3, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray gun as method of application, equipped with a dry filter, and exhausting through stack S7.

(~~c~~ **e**) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of ~~0.25~~ **0.29** units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

(~~d~~ **f**) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of ~~0.12~~ **0.36** units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Pursuant to [326 IAC 2-8-4] ~~T~~**t**he total **input of** VOC ~~usage~~ at the paint shop **spray booths** ~~operation - P1~~ **PB1, P4, PB2, and pit area PB3**, ~~vehicle touch-up painting operation - P4~~, terra glue operation, P5 and turtle top glue operation, P6 including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paint undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than ~~99.78~~ **99.0** tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

(a) **Pursuant to [326 IAC 2-8-4]** ~~T~~the total **input** ~~usage~~ of any single hazardous air pollutant (HAP) at the paint shop **spray booths** ~~operation - P1~~ **PB1, P4, PB2, and pit area PB3**, ~~vehicle touch-up painting operation - P4~~, terra glue operation**,** P5 and turtle top glue operation**,** P6 shall be limited to less than ~~10~~ **9.9** tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) **Pursuant to [326 IAC 2-8-4]** ~~T~~the total **input** ~~usage~~ of all hazardous air pollutants (HAPs) at the paint shop **spray booths** ~~operation - P1~~ **PB1, P4, PB2, and undercoating pit area PB3**, ~~vehicle touch-up painting operation - P4~~, terra glue operation**,** P5 and turtle top glue operation**,** P6 shall be limited to less than ~~25~~ **24.9** tons per twelve (12) consecutive month period. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month.

~~D.1.3 PM_{10} Emission Limitation [326 IAC 2-8-4]~~

~~The total solids input to the applicators coatings applied by the of the paint shop operation - P1, spray booth PB1, vehicle touch-up painting operation paint booth - P4, frame painting booth PB2, undercoating pit area PB3, terra glue operation P5, and turtle top glue operation P6, when spray coating, based on 50% transfer efficiency of the air atomization spray gun booths and 75% transfer efficiency of the HVLP spray gun booths, and 98% control efficiency of the dry filters shall be limited such that total PM/PM10 emissions as follows:~~

~~A (1-0.5) (1-0.98) + B (1-0.75) (1-0.98) < 61.01 tons per year~~

~~equivalent to:~~

~~A + 0.5B < 6101 tons per year~~

~~where:~~

~~A = Total solids input at the air atomized air spray guns~~

~~B = Total solids input at the HVLP spray guns~~

~~Therefore, the total solids input at the air atomized spray gun booths and half of the total solids input at the HVLP spray gun booths,~~ shall not exceed ~~6101~~ **61.01** tons per twelve ~~(12) consecutive month period with compliance determined at the end of each month~~. ~~This limit is equivalent to PM/PM_{10} emissions of less than 100 tons per year from the entire source. Compliance with this limit shall make the requirements of 326 IAC 2-7, Part 70 not applicable~~.

~~D.1.4 Particulate Matter (PM) [40 CFR 52 Subpart P]~~

~~Pursuant to 40 CFR 52 Subpart P, the PM from the spray coating in the paint shop operation - P1, vehicle touch-up painting operation - P4, terra glue operation - P5 and turtle top glue operation - P6 shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~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.1.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating input at the paint shop operation- PB1, and P4, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air dried coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating input at the frame primer coating booth- PB2 shall be limited to 3 pounds of VOC per gallon of coating less water, as delivered to the applicator for any calendar day.

D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.5 ~~PM Emission Limitation [326 IAC 2-8-4]~~ **Particulate Control**

Pursuant to 326 IAC 6-3-2(d), particulate from the paint shop ~~operation~~ **spray booths** - **PB1, P4, PB2, PB3, and two (2) glue operations P5, and P6** shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by ~~using formulation data supplied by the coating manufacturer.~~ **preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets.** IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limits in Condition D.1.3(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^{n} (C_i \times U_i)}{\sum_{i=1}^{n} U_i}$$

where: A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;
C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;
U is the usage rate of the coating *i* in gallons per day less water and exempt

solvents as applied; and
n is the number of coatings being averaged

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.4, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

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

D.1.~~8~~**9** Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S1 while the booth is in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If** a condition exists which should result in a response step **the permittee shall take reasonable** ~~Failure to take~~ 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.** ~~Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

~~(b) Monthly inspections shall be performed for the presence of overspray emissions from Stack S1 on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.~~9~~**10** Record Keeping Requirements

(a) To document compliance with Condition D.1.1, and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and HAP emission limits established in Condition D.1.1, and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount, and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The total VOC usage for each month;

(4) The total individual and combined HAP usage for each month;

(5) The weight of VOCs emitted for each compliance period; and

(6) The weight of total individual and combined HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records of the amount of solids delivered to the applicators for each month.

(c) To document compliance with Condition D.1.3(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.4.

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

(2) The amount of coating material and solvent less water used on daily basis;

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

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

(3) The volume weighted average VOC content of the coatings used for each day. If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.4, then the Permittee shall not be required to maintain records of the volume weighted average VOC content of the coatings used in that operation on that day;

(4) The cleanup solvent usage for each day; and

(5) The total VOC usage for each day.

(~~c~~**d**) To document compliance with Condition D.1.~~8~~**10**, the Permittee shall maintain a log of weekly overspray observations, once per day and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.~~10~~**11** Reporting Requirements

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

...

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(g) One (1) surface preparation operation consisting of polishing, buffing, surface grinding and sanding using handheld equipment in building #5, constructed in 2007, identified as SP, with a maximum capacity of 0.65 vehicle units per hour at a material process weight rate of 3.38 tons per hour, equipped with two downdraft filters, C3 and C5 for particulate control, and exhausting through stacks S3 and S5.

(~~e~~ **h**) One (1) woodworking operation, constructed in 1978, identified as P2**, controlled by two cyclones, C-2A and C-2B, each with an air flow rate of less than 4,000 acfm,** ~~with a flow rate of 2200 acfm~~, **operating at a process weight rate of 700 pounds of wood per hour**, ~~utilizing a cyclone rated at 90% efficiency for particulate control~~ and exhausting **through stacks S2A and S2B, respectively** ~~to stack S2~~.

(The information describing the process contained in this facility 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 [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from surface preparation operation, identified as SP, shall not exceed 9.27 pounds per hour when operating at a process weight rate of 3.38 tons per hour.

(~~a~~**b)** Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed ~~8.33~~ **2.03** pounds per hour when operating at a process weight rate of ~~5,760~~ **700** pounds **of wood** per hour.

The pounds per hour limitation was calculated with the following equation for conditions (a) and (b):

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

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

and P = process weight rate in tons per hour

...

Compliance Determination Requirements

D.2.3 Particulate Control

(a) In order to comply with condition D.2.1(a), the dry filters for particulate control shall be in operation and control emissions from the surface preparation facility (SP) at all times that the surface preparation facility is in operation.

(b) In order to comply with condition D.2.1 **(b)**, the ~~baghouse~~ **cyclones** for particulate control shall be in operation and control emissions from the woodworking facility **(P2)** at all times that the woodworking facilities are in operation.

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

D.2.4 Visible Emissions Notations

(a) Daily visible emission notations of wood working stack exhausts shall be

performed during normal daylight operations when exhausting to the atmosphere. 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.2.5 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the wood working operation P2 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).

(b) 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
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-~~5674~~ **0178**
Fax: 317-233-~~5967~~ **6865**

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Independent Protection Company, Inc.
Source Address: **Turtle Top Division**: 67819 State Road 15, New Paris, IN 46553
~~67895 Industrial Drive, New Paris, IN 46553~~
Mailing Address: 67819 State Road 15, New Paris, IN 46553
FESOP No.: F039-10339-00448

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-~~5674~~ **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-~~5967~~**6865),** and follow the other requirements of 326 IAC 2-7-16

...

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

FESOP Quarterly Report (I)

Source Name: Independent Protection Company, Inc.
Source Address: **Turtle Top Division:** 67819 State Road 15, New Paris, IN 46553
~~67895 Industrial Drive, New Paris, IN 46553~~
Mailing Address: 67819 State Road 15, New Paris, IN 46553
FESOP No.: F039-10339-00448
Facility: paint shop **spray booths** ~~operation~~ - ~~P1~~ **PB1, P4, PB2, PB3**, terra glue operation**,** P5 and turtle top glue operation**,** P6

Parameter: VOC, single and combined HAPs usages
Limit: (a) total VOC usage at the paint shop **spray booths** ~~operation~~ - ~~P1~~ **PB1, P4, PB2, PB3**, terra glue operation**,** P5 and turtle top glue operation**,** P6, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.~~78~~ **0** tons per twelve (12) consecutive month period.

(b) total usage of any single hazardous air pollutant (HAP) at the paint shop **spray booths** ~~operation~~ - ~~P1~~ **PB1, P4, PB2, PB3**, terra glue operation**,** P5 and turtle top glue operation**,** P6 shall be limited to less than ~~10~~ **9.9** tons per twelve (12) consecutive month period.

(c) combined usage of all hazardous air pollutants (HAPs) at the paint shop **spray booths** ~~operation~~ - ~~P1~~ **PB1, P4, PB2, PB3**, terra glue operation**,** P5 and turtle top glue operation**,** P6 shall be limited to less than ~~25~~ **24.9** tons per twelve (12) consecutive month period.

...

...

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant on March 6, 30, April 10, April 22, and May 1, July 15 and July 24, 2008. An application for the purposes of this review was received on February 11, 2008.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 039-26080-00448. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Swarna Prabha at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5376 number or toll free at 1-800-451-6027 extension 45376 number.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

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(c) 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.

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Appendix A: Emission Calculations
Emission Summary

Company Name: Independent Protection Co., Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN

FESOP No.: F039-10339-00048
Significant Permit Revision No.: 039-26080-00448
Reviewer: Swarna Prabha

Uncontrolled Potential Emissions (tons/year)

Category	Emissions Generating Activity												
	Pollutant	Existing emission Units								New Emission Units			
Criteria Pollutants		Natural Gas* space heaters	Revised (1) Natural gas space heaters	Paint shop spray booths** (P1) Operations PB1, P4, PB2, PB3, P5, P6	Wood Work	Welding Operations	Surface Preparation	Revised (2) Turtle Top	Revised (2) Terra P6	Paint shop spray booths(2) PB1, P4, PB2, PB3	Natural Gas Combustion 13 units	Band Saw	**TOTAL**
	PM	0.04	0.04	117.91	82.59	2.23	21.36	7.19	6.57	50.12	0.09	0.010	170.2
	PM10	0.17	0.15	117.91	82.59	2.23	21.36	7.19	6.57	50.12	0.35	0.010	170.6
	SO2	0.01	0.01								0.03		0.04
	NOx	2.27	1.92								3.18		5.1
	VOC	0.12	0.11	163.7				60.15	63.56	30.34	0.25		154.4
	CO	1.91	1.61	0.00							3.87		5.5
Hazardous Air Pollutants	1,3-Butadiene			74.58									
	Acetaldehyde			69.48									
	Xylenes							2.12	4.97	1.78			8.9
	Toluene		6.53E-05					17.36	13.13		1.57E-04		30.5
	Ethyl Benzene							0.25		0.36			0.6
	Benzene		4.04E-05										4.0E-05
	Glycol Ethers							0.12	0.19	1.24E+00			1.6
	Hexane		3.46E-02					7.33	9.17		8.30E-02		16.6
	Formaldehyde		1.44E-03								3.46E-03		4.9E-03
	Chromium		2.69E-05							3.08E-01	6.45E-05		3.1E-01
	Nickel		4.04E-05								9.68E-05		1.4E-04
	Methanol							2.04					2.0
	Naphthalene									1.98E-02			2.0E-02
	MIBK							2.04		0.42			2.5
	Totals		3.62E-02	144.06				31.27	27.47	4.12	0.087		62.98

Controlled Potential Emissions (tons/year)

Category	Emissions Generating Activity												
	Pollutant	Existing emission Units								New Emission Units			
Criteria Pollutants		Natural Gas* space heaters	Revised(1) Natural gas space heaters	Paint shop spray booths** (P1) Operations PB1, P4, PB2, PB3, P5, P6	Wood Work	Welding Operations	Surface Preparation	Revised (2) Turtle Top	Revised (2) Terra P6	Paint shop spray booths(2) PB1, P4, PB2, PB3	Natural Gas Combustion 13 units	Band Saw	**TOTAL**
	PM	0.04	0.04	2.36	8.26	2.23	0.43	0.14	0.13	3.56	0.09	0.010	14.9
	PM10	0.17	0.15	2.36	8.26	2.23	0.43	0.14	0.13	3.56	0.35	0.010	15.3
	SO2	0.01	0.01	0.00							0.03		0.04
	NOx	2.27	1.92	0.00							3.18		5.10
	VOC	0.12	0.11	99.78(3)				***		***	0.25		**<99.36**
	CO	1.91	1.61	0.00							3.87		5.5
Hazardous Air Pollutants	1,3-Butadiene			74.58									
	Acetaldehyde			69.48									
	Xylenes							2.12	4.97	1.78			****
	Toluene		1.57E-04					17.36	13.13		1.57E-04		****
	Ethyl Benzene							0.25		0.36			0.6
	Benzene		4.04E-05										
	Glycol Ethers							0.12	0.19	1.24			****
	Hexane		3.46E-02					7.33	9.17		8.30E-02		****
	Formaldehyde		1.44E-03								3.46E-03		4.9E-03
	Chromium		2.69E-05							3.08E-01	6.45E-05		3.1E-01
	Nickel		4.04E-05								9.68E-05		1.4E-04
	Methanol							2.04					****
										1.98E-02			
	MIBK							2.04		0.42			****
	Totals		3.63E-02	144.06				31.27	27.47	4.12	0.087		**<25**

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits
NOTES:

(1) The corresponding emissions are the result of a revision to existing natural gas space heaters*. The seven space heaters combined capacity of 0.8 MMBTU/hour were destroyed as a result of the fires of July 28, 2006. The revised values supercede and replace the original values, which are no longer counted in the Total emissions.

(2) The corresponding emissions are the result of a revision to the existing coating operations**. The revised values supercede and replace the original values, which are no longer counted in the Total emissions.

(3) VOC Emission Limits permit EFSOP #039-10339-00448

NOTE: * Existing natural gas space heaters - FESOP #039-10339-00448
** Existing emissions from Paint shop spray booth.
*** Source has requested to limit the VOC emissions to less than 99.0 tons per year from Paint shop spray booths and gluing operation to render the requirements of 326IAC 2-7(part 70) not ap
**** Source has requested to limit the individual HAP to be less than 9.9 tons per year for the paint shop spray booths and gluing operation.

Appendix A: Emission Calculations
Paint Booths PB1 and P4 - VOC, Particulates and HAPs

Company Name: Independent Protection Co., Inc.
Address: 67819 State Road 15, New Paris, IN
FESOP No.: F039-26080-00448
Reviewer: Swarna Prabha

PB1 and P4- Particulates, VOC and HAPs

Material	Product Code	Density (lbs/gal)	Weight % Water	Weight % Exempt	Weight % VOC	Weight % Solids	Maximum Capacity (unit/hr)	Maximum Capacity (gal/unit)	Maximum Usage (gals/hour)	VOC (lbs/gal)	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE PM/PM10 (lbs/hr)	PTE of PM/PM10 Before Controls (tons/year)	PTE of PM/PM10 After Controls (tons/year)	Transfer Efficiency**
Ready Mix 3.5 M6466	381761	10.65	0.00%	0.00%	34.22%	65.78%	0.65	0.2781	0.1808	3.64	0.66	15.81	2.89	1.27	1.39	0.069	75%
Ready Mix 3.5 FLNA40703M	381762	10.62	0.00%	0.00%	34.09%	65.91%	0.65	0.5332	0.3466	3.62	1.25	30.11	5.49	2.43	2.66	0.133	75%
3.5 System A3.5 Activator	399093	8.74	0.00%	0.00%	38.93%	61.00%	0.65	0.2678	0.1741	3.40	0.59	14.22	2.59	0.93	1.02	0.051	75%
Autoclear HS & LV Clearcoat	390836	9.57	0.00%	49.70%	10.00%	40.30%	0.65	0.1010	0.0657	0.96	0.06	1.51	0.28	0.25	0.28	0.014	75%
Autoclear HS & LV Hardener	390837	10.55	0.00%	58.25%	0.00%	41.25%	0.65	0.0337	0.0219	0.00	0.00	0.00	0.00	0.10	0.10	0.005	75%
Activ LV Std Thinner	390838	9.49	0.00%	58.45%	28.72%	12.83%	0.65	0.0673	0.0437	2.73	0.12	2.86	0.52	0.05	0.06	0.003	75%
Autocoat BT 300 Binder Q10F	391082	7.66	0.00%	0.00%	82.92%	17.13%	0.65	0.1723	0.1120	6.36	0.71	17.08	3.12	0.15	0.16	0.008	75%
Standard Hardener	387160	8.45	0.00%	0.00%	50.15%	49.70%	0.65	0.0172	0.0112	4.24	0.05	1.14	0.21	0.05	0.05	0.003	75%
High Performance Reducer	391064	7.35	0.00%	0.00%	100.00%	0.00%	0.65	0.0948	0.0616	7.35	0.45	10.87	1.98	0.00	0.00	0.000	75%
Colorbuild 2.1/2.8 Black Prim	382512	13.60	0.00%	30.53%	11.47%	58.00%	0.65	0.2214	0.1439	1.56	0.22	5.39	0.98	1.14	1.24	0.062	75%
Colorbuild 2.1/2.8 Hardener	384225	10.45	0.00%	62.18%	0.00%	37.82%	0.65	0.0554	0.0360	0.00	0.00	0.00	0.00	0.14	0.16	0.008	75%
2.1/2.8 Primer Sealer Activato	391203	9.97	0.00%	70.90%	28.23%	0.87%	0.65	0.0163	0.0106	2.82	0.03	0.72	0.13	0.00	0.00	0.000	75%
2.1/2.8 Primer Surf Activator	386258	10.29	0.00%	100.00%	0.00%	0.00%	0.65	0.0438	0.0285	0.00	0.00	0.00	0.00	0.00	0.00	0.000	75%
OTO Body Coat	315787	10.29	42.32%	0.00%	5.00%	52.32%	0.65	0.2100	0.1365	0.51	0.07	1.69	0.31	0.73	0.80	0.040	75%
Totals									**1.37**		**4.22**	**101.38**	**18.50**	**7.23**	**7.92**	**0.40**	

HAPs

Material	Product Code	Density (lbs/gal)	Maximum Capacity (gal/unit)	Maximum Usage (gals/hour)	Weight % MIBK	Weight % Xylene	Weight % Ethyl benzene	Weight % Glycol Ether	Weight % Naph thalene	Weight %Chromium Cmpds	PTE of MIBK (tons/yr)	PTE of Xylene (tons/yr)	PTE of Ethylbenzene (tons/yr)	PTE of Gylcol Ether (tons/yr)	PTE of Naphthalene (tons/yr)	PTE of Chromium (tons/yr)	Total PTE of HAPs
Ready Mix 3.5 M6466	381761	10.65	0.2781	0.1808	5.0%	5.0%	1.0%	0.0%	0.0%	0.0%	0.42	0.42	0.08	0.00	0.00	0.00	0.93
Ready Mix 3.5	381762	10.62	0.5332	0.3466	0.0%	5.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.81	0.16	0.00	0.00	0.00	0.97
3.5 System A3.5 Activator	399093	8.74	0.2678	0.1741	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Autoclear HS & LV Clearcoat	390836	9.57	0.1010	0.0657	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Autoclear HS & LV Hardener	390837	10.55	0.0337	0.0219	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Activ LV Std Thinner	390838	9.49	0.0673	0.0437	0.0%	0.0%	0.0%	18.0%	0.0%	0.0%	0.00	0.00	0.00	0.33	0.00	0.00	0.33
Autocoat BT 300 Binder Q10BV	391082	7.66	0.1723	0.1120	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Standard Hardener	387160	8.45	0.0172	0.0112	0.0%	25.0%	5.0%	0.0%	0.0%	0.0%	0.00	0.10	0.02	0.00	0.00	0.00	0.12
High Performance Reducer	391064	7.35	0.0948	0.0616	0.0%	0.0%	0.0%	25.0%	1.0%	0.0%	0.00	0.00	0.00	0.50	0.02	0.00	0.52
Colorbuild 2.1/2.8 Black Primer	382512	13.60	0.2214	0.1439	0.0%	5.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.43	0.09	0.00	0.00	0.00	0.51
Colorbuild 2.1/2.8 Hardener	384225	10.45	0.0554	0.0360	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2.1/2.8 Primer Sealer Activator	391203	9.97	0.0163	0.0106	0.0%	3.4%	0.7%	24.0%	0.0%	0.0%	0.00	0.02	0.00	0.11	0.00	0.00	0.13
2.1/2.8 Primer Surf Activator	386258	10.29	0.0438	0.0285	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OTO Body Coat	315787	10.29	0.2100	0.1365	0.0%	0.0%	0.0%	5.0%	0.0%	5.0%	0.00	0.00	0.00	0.31	0.00	0.31	0.31
Total PTE Of HAPs											**0.422**	**1.775**	**0.355**	**1.242**	**0.020**	**0.308**	**3.814**

NOTES:

1. Weight % Exempt is weight % of exempt non-photochemical reactive organic compounds.
2. Weight % VOC is weight % of VOC less exempt in material. Note that VOC reported in Akzo Nobel MSDSs are VOC less exempt in coating per Akzo Nobel 7-8-08.
3. Maximum Capacities as reported by source, based on historical production and actual coating materials used per unit.
4. Product Code 390838 contains 58.45% by weight and 50% by volume exempt material per Akzo Nobel 7-8-08.
5. Product Code 391203 contains 70.90% by weight and 63.02% by volume exempt material per Akzo Nobel 7-8-08.
6. Dry filter control efficiency is 98% per filter manufacturer.
7. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

METHODOLOGY

Maximum Usage *(gals/hour) = [Maximum Capacity (unit/hr)] x [Maximum Capacity (gal/unit)]
VOC (lbs/gal) = [Density (lbs/gal)] x [Weight % VOC/100%]
PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] * [Weight % VOC/100%]
PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]
PTE of VOC (tons/yr) = [PTE of VOC (lbs/hr)] * [(8760 hours/yr)] * [1 ton/2000 lbs]
PTE PM/PM10 (lbs/hr) = [Maximum Usage (gals/hour] x [Weight % solids/100%]
PTE of PM/PM10 Before Controls (tons/year) = [PTE PM/PM10 (lbs/hour)] x[8760 (hours/year]) x [1 ton/2000 lbs] x [1 - Transfer Efficiency %]
PTE PM/PM10 After Controls (tons/yr) = [PTE of PM/PM10 (tons/yr)] x [1-(% control efficiency/100%)]
HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] * [Weight % HAP] * [8760 hours/yr] * [1 ton/2000 lbs]

Appendix A: Emission Calculations
VOC and Particulate
VOC, Particulate and HAPs Emissions from Paint Booths PB2 and PB3

Company Name: Independent Protection Co., Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP No.: F039-10339-00048
Significant permit revision No.: 039-26080-00448
Reviewer: Swarna Prabha

Physical Data for Coating Components as Supplied-PB2 and PB3

										Ethyl		
		Ave. Gallons	Density	% VOC	% Solids	%Solids	VOC	Solids	Toluene	benzene	Xylene	MIBK
Product Id		Per Vehicle	(lbs/gal)	by WT.	by WT.	by Vol.	(lbs/gal)	(lbs/gal)	% by WT	% by WT.	% by WT.	% by WT.
	Booth PB2											
3-0855 PB	Frame Primer	2.760	9.34	13.38%	36.08%	31.73%	1.25	3.37	0.00%	0.00%	0.00%	0%
	Booth PB3											
Z Guard-9902S	Undercoating	7.097	10.43	0.96%	55.00%	45.00%	0.10	5.73	0.00%	0.00%	0.00%	0%

Volatile Organic Compounds (VOC) , Particulate Matter (PM) and HAPs

		Primary			Uncontrolled PTE			Controlled PTE		PTE	PTE	PTE	Total		Ethyl		
Paint Booths PB1 and P4		surface	Paint used	Transfer	PM/PM10	PM	PM-10	PM	PM-10	VOC	VOC	VOC	HAP	Toluene	benzene	Xylene	MIBK
Emission Unit	**Name**	coated	gal/hr	Efficiency	lbs/hr	tons/yr	tons/yr	tons/yr	tons/yr	lb/hr	lbs/day	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Metal surface coating sepecifically regulated by 326 IAC 8-2-9																	
Paint Booth PB2																	
*PB2	Frame Primer	Steel frame	1.794	50%	3.02	13.24	13.24	0.26	0.26	2.242	**53.82**	9.82	0.000	0.000	0.000	0.000	0.000
Paint Booth PB3																	
**PB3	**Undercoating	Steel and wood	4.613	75%	6.61	28.96	28.96	2.90	2.90	0.461	11.07	2.02	0.000	0.000	0.000	0.000	0.000
	Total				**9.64**	**42.20**	**42.20**	**3.16**	**3.16**	**2.70**	**64.89**	**11.84**					
											Total HAPs		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

NOTES:
1. Estimated emissions based upon a maximum of 0.65 vehicles per hour.
2.* Manufacturer rated filter efficiency is 98%
3. **Efficiency of controls in Undercoating is 90%
4. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
HAP tons/yr = (gallons/yr) x (lbs HAP/gal)*(8760hrs/yr)/(2000 lbs/ton)

Appendix A: Emission Calculations
P5 Terra Glue Operation - Adhesive Applied to Wood, carpeting, vinyl, metal

Company Name: Independent Protection Co., Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP No.: F039-10339-00048
Significant Permit Revision No.: 039-26080-00448
Reviewer: Swarna Prabha

Terra Glue Operation P5- Particulates, VOC and HAPs

															Ethyl	Glycol
		Ave. Gallons	Density	% VOC	% Solids	%Solids	VOC	Solids	Hexane	Toluene	Methanol	MIBK	Xylenes	Benzene	Ethers
ID Number	Coating Name	Per Vehicle	(lbs/gal)	by WT.	by WT.	by Vol.	(lbs/gal)	(lbs/gal)	% by Wt.	% by Wt.	% by Wt.	% by Wt.	% by Wt.	% by Wt.	% by Wt.
526-2	Tite Bond Wood Glue	1.516	8.84	21.30%	65.46%	66.00%	1.88	5.79	13.18%	8.12%	0.00%	0.00%	0.00%	0.00%	0.00%
BAS 2960	Danco Red Bulk Adhesive	3.992	6.67	46.70%	22.00%	14.10%	3.12	1.47	8.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Danco 2965C	Danco Clear Bulk Adhesive	3.105	6.88	39.20%	23.95%	20.60%	2.70	1.65	7.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%
ADPRO	Danco Aerosol Spray Adhesive	0.154	7.11	60.00%	11.00%	12.55%	4.27	0.78	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Primer 94	3M Cleaner	0.136	6.84	91.46%	0.00%	0.00%	6.26	0.00	0.00%	0.00%	0.00%	0.00%	35.00%	7.00%	0.00%
221	Sika Flex adhesive	1.406	10.26	4.00%	96.00%	94.41%	0.41	9.85	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00%
R. Williams	Lacquer Thinner	2.298	7.00	100.00%	0.00%	0.00%	7.00	0.00	0.00%	60.00%	10.00%	10.00%	0.00%	0.00%	0.00%
AO 420	Plexis Adhesive	4.022	8.01	5.21%	94.49%	93.63%	0.42	7.57	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Self leveling sealant	0.614	10.68	22.70%	77.30%	66.62%	2.42	8.25	0.00%	8.90%	0.00%	0.00%	0.00%	0.00%	0.00%
CX73-070	Pro 2000 Adhesive Sealant	0.307	8.34	55.00%	45.00%	37.51%	4.59	3.75	0.00%	0.00%	0.00%	0.00%	30.00%	5.00%	0.00%
	Champ Glass Cleaner	0.212	9.17	7.98%	0.00%	0.00%	0.73	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%
98-3	Black Enamel	0.175	7.51	60.00%	16.90%	31.66%	4.51	1.27	0.00%	15.92%	0.00%	0.00%	0.00%	0.00%	0.00%

		Gallons/	Transfer	Application
ID Number	Coating Name	Hour	Efficiency	Method
526-2	Tite Bond Wood Glue	0.440	100%	Wiping
BAS 2960	Danco Red Bulk Adhesive	1.158	50%	HVLP Gun
Danco 2965C	Danco Clear Bulk Adhesive	0.900	50%	HVLP Gun
ADPRO	Danco Aerosol Spray Adhesive	0.045	50%	Aerosol Can
Clean up operation				
Primer 94	3M Cleaner	0.039	100%	Wiping
R. Williams	Lacquer Thinner	0.667	100%	Wiping
	Champ Glass Cleaner	0.061	100%	Wiping
Metal coating				
221	Sika Flex adhesive	0.408	100%	Wiping
AO 420	Plexis Adhesive	1.166	100%	Wiping
	Self leveling sealant	0.178	100%	Wiping
CX73-070	Pro 2000 Adhesive Sealant	0.089	100%	Wiping
98-3	Black Enamel	0.051	50%	Aerosol Can

Volatile Organic Compounds (VOC) , Particulate Matter (PM) and HAPs

				Uncontrolled		Controlled											
Primary type surface		Gallons/	PM	PM	PM-10	PM/PM10	VOC	VOC	VOC	Hexane	Toluene	Methanol	MIBK	Xylenes	Ethyl Benzene	Glycol Ethers	HAP
Coated	Coating Name	Hour	lbs/hr	tons/yr	tons/yr	tons/yr	lb/hr	lb/day	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Wood-to-wood	Tite Bond Wood Glue	0.440	0.000	0.000	0.000	0.000	0.828	19.867	3.626	2.244	1.382	0.000	0.000	0.000	0.000	0.000	3.626
Wood to plastic	Danco Red Bulk Adhesive	1.158	0.850	3.721	3.721	0.074	3.607	86.570	15.799	2.977	0.000	0.000	0.000	0.000	0.000	0.000	2.977
Wood to plastic	Danco Clear Bulk Adhesive	0.900	0.742	3.249	3.249	0.065	2.428	58.280	10.636	1.899	2.713	0.000	0.000	0.000	0.000	0.000	4.613
Wood to rubber	Danco Aerosol Spray Adhesive	0.045	0.017	0.077	0.077	0.002	0.191	4.581	0.836	0.209	0.000	0.000	0.000	0.000	0.000	0.000	0.209
Clean up operation																	
Clean up	3M Cleaner	0.039	0.000	0.000	0.000	0.000	0.246	5.913	1.079	0.000	0.000	0.000	0.000	0.413	0.083	0.000	0.496
Clean wipe metal	Lacquer Thinner	0.667	0.000	0.000	0.000	0.000	4.666	111.977	20.436	0.000	12.262	2.044	2.044	0.000	0.000	0.000	16.349
Window cleaner	Champ Glass Cleaner	0.061	0.000	0.000	0.000	0.000	0.045	1.079	0.197	0.000	0.000	0.000	0.000	0.000	0.000	0.123	0.123
metal coating																	
Steel to aluminum	Sika Flex adhesive	0.408	0.000	0.000	0.000	0.000	0.167	4.016	0.733	0.000	0.000	0.000	0.000	0.733	0.000	0.000	0.733
Metal fabic wood	Plexis Adhesive	1.166	0.000	0.000	0.000	0.000	0.486	11.667	2.129	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Caulk applied/metal	Self leveling sealant	0.178	0.000	0.000	0.000	0.000	0.431	10.348	1.889	0.000	0.740	0.000	0.000	0.000	0.000	0.000	0.740
Caulk applied/metal	Pro 2000 Adhesive Sealant	0.089	0.000	0.000	0.000	0.000	0.408	9.794	1.787	0.000	0.000	0.000	0.000	0.975	0.162	0.000	1.137
Touchup paint -metal	Black Enamel	0.051	0.032	0.141	0.141	0.003	0.228	5.473	0.999	0.000	0.265	0.000	0.000	0.000	0.000	0.000	0.265
Total	**PTE**		**1.641**	**7.19**	**7.19**	**0.14**			**60.15**								
										Total HAPs	**7.329**	**17.362**	**2.044**	**2.044**	**2.121**	**0.245**	**0.123**	**31.268**

NOTES:

1. Emissions are based upon a maximum of 0.29 vehicles per hour.
2. Manufacturer rated filter efficiency is 98%
3. NOTE: Each work station on P5 has one spray gun for bulk adhesive . The quantities reported are the sum of all materials used in all workstations.
4. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
HAP lbs/hr = (gallons/hr) x (lbs/gal) x (% HAP/100%)

Company Name: Independent Protection Co., Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP No.: F039-10339-00048
Significant Permit Revision No.: 039-26080-00448
Reviewer: Swarna Prabha

Turtle Top Glue Operation P6- Particulates, VOC and HAPs

Physical Data for Coating Components as Supplied		Ave. Gallons	Density	% VOC	% Solids	%Solids	VOC	Solids	Hexane	Toluene	Xylenes	Glycol ethers
ID Number	Coating Name	Per Vehicle	(lbs/gal)	by WT.	by WT.	by Vol.	(lbs/gal)	(lbs/gal)	% by Wt.	% by Wt.	% by Wt.	% by Wt.
526-2	Tite Bond Wood Glue	0.330	8.84	21.30%	65.46%	66.00%	1.88	5.79	13.18%	8.12%	0.00%	0.00%
BAS 2960	Danco Red Bulk Adhesive	1.065	6.67	46.70%	22.00%	14.10%	3.12	1.47	8.80%	0.00%	0.00%	0.00%
Danco 2965C	Danco Clear Bulk Adhesive	0.355	6.88	39.23%	23.95%	20.60%	2.70	1.65	7.00%	10.00%	0.00%	0.00%
ADPRO	Danco Aerosol Spray Adhesive	0.856	7.11	60.02%	11.00%	12.55%	4.27	0.78	15.00%	0.00%	0.00%	0.00%
H00H012	Bender's #2 Solvent	0.323	7.26	100.00%	0.00%	0.00%	7.26	0.00	0.00%	100.00%	0.00%	0.00%
226	Sika Cleaner	0.041	6.70	99.40%	0.00%	0.00%	6.66	0.00	0.00%	0.00%	0.00%	0.00%
252	Sika Flex adhesive	2.532	10.01	5.48%	94.52%	92.53%	0.55	9.46	0.00%	0.00%	4.48%	0.00%
AO 420	Plexis Adhesive	0.047	8.01	5.21%	94.49%	93.63%	0.42	7.57	0.00%	0.00%	0.00%	0.00%
	WD40	0.194	6.81	50.76%	49.24%	26.00%	3.46	3.36	0.00%	0.00%	0.00%	0.00%
	Champ Glass Cleaner	0.097	9.17	7.98%	0.00%	0.00%	0.73	0.00	0.00%	0.00%	0.00%	5.00%
98-3	Black Enamel	0.145	7.51	60.00%	16.90%	31.66%	4.50	1.27	0.00%	15.92%	0.00%	0.00%
1G2E010	Bender's Fabric Cleaner	0.131	10.01	41.47%	0.00%	0.00%	4.15	0.00	0.00%	0.00%	0.00%	0.00%

		Gallons/	Transfer	Application
ID Number	Coating Name	Hour	Efficiency	Method
526-2	Tite Bond Wood Glue	0.330	100%	Wiping
BAS 2960	Danco Red Bulk Adhesive	1.065	50%	HVLP Gun
Danco 2965C	Danco Clear Bulk Adhesive	0.355	50%	HVLP Gun
ADPRO	Danco Aerosol Spray Adhesive	0.856	50%	Aerosol Can
Clean up				
H00H012	Bender's #2 Solvent	0.323	100%	Wiping
	WD40	0.194	100%	Wiping
	Champ Glass Cleaner	0.097	100%	Wiping
1G2E010	Bender's Fabric Cleaner	0.131	50%	Aerosol Can
metal coating				
226	Sika Cleaner	0.041	100%	Wiping
252	Sika Flex adhesive	2.532	100%	Wiping
AO 420	Plexis Adhesive	0.047	100%	Wiping
98-3	Black Enamel	0.145	50%	Aerosol Can

Volatile Organic Compounds (VOC) , Particulate Matter (PM) and HAPs

		Maximum	Maximum		Uncontrolled		Controlled							Glycol	Total
Primary Typer of		usage	Usage	PM/PM10	PM	PM-10	PM/PM10	VOC	VOC	VOC	Hexane	Toluene	Xylenes	Ethers	HAP
surface coated	Coating Name	gal/hr	gal/day	lbs/hr	tons/yr	tons/yr	tons/yr	lb/hr	lb/day	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Wood to wood	Tite Bond Wood Glue	0.330	7.928	0.000	0.000	0.000	0.000	0.622	14.93	2.724	1.686	1.039	0.000	0.000	2.724
Wood to rubber	Danco Red Bulk Adhesive	1.065	25.548	0.781	3.422	3.422	0.068	3.317	79.60	14.528	2.738	0.000	0.000	0.000	2.738
wood-plastic-rug	Danco Clear Bulk Adhesive	0.355	8.516	0.292	1.280	1.280	0.026	0.958	22.98	4.194	0.748	1.069	0.000	0.000	1.818
wood-plastic-rug	Danco Aerosol Spray Adhesive	0.856	20.555	0.335	1.467	1.467	0.029	3.655	87.72	16.008	4.001	0.000	0.000	0.000	4.001
Clean up operation															
Clean up	Bender's #2 Solvent	0.323	7.742	0.000	0.000	0.000	0.000	2.343	56.24	10.264	0.000	10.264	0.000	0.000	10.264
Clean rubber	WD40	0.194	4.645	0.000	0.000	0.000	0.000	0.669	16.07	2.932	0.000	0.000	0.000	0.000	0.000
Clean windows	Champ Glass Cleaner	0.097	2.323	0.000	0.000	0.000	0.000	0.071	1.70	0.310	0.000	0.000	0.000	0.194	0.000
Clean fabric	Bender's Fabric Cleaner	0.131	3.135	0.000	0.000	0.000	0.000	0.542	13.01	2.375	0.000	0.000	0.000	0.000	0.000
metal coating															
Clean painted Aluminum	Sika Cleaner	0.041	0.982	0.000	0.000	0.000	0.000	0.272	6.54	1.193	0.000	0.000	0.000	0.000	0.000
Painted steel to aluminum	Sika Flex adhesive	2.532	60.760	0.000	0.000	0.000	0.000	1.388	**33.32**	6.081	0.000	0.000	4.972	0.000	4.972
Metal plastic…	Plexis Adhesive	0.047	1.119	0.000	0.000	0.000	0.000	0.019	0.47	0.085	0.000	0.000	0.000	0.000	0.000
Paint Aluminum	Black Enamel	0.145	3.484	0.092	0.403	0.403	0.008	0.654	15.69	2.863	0.000	0.760	0.000	0.000	0.760
Total	**PTE**				**6.573**	**6.573**	**0.131**			**63.559**					

NOTES:

1. Emissions are based upon a maximum of 0.36 vehicles per hour.
2. Each work station on P6 has one spray gun for bulk adhesive . The quantities reported are the sum of all materials used in all workstations.
3. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

Total Haps	9.173	13.131	4.972	0.194	27.470

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
HAP tons/yr = (gallons/hr) x (lbs/gal) x (% HAP/100%) * (8760hrs/yr)/(2000 lbs/ton)

Appendix A: Emissions Calculations
Particulate
Surface Prep operation (SP)

Company Name: Independent Protection Co., Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP No.: F039-10339-00048
Significant Permit Revision No.: 039-26080-00448
Reviewer: Swarna Prabha

Paint Shop, Surface Preperation (SP)*

		Gallons/	Transfer	Density (lbs/gal)	Weight % Solids	Solids
Product Id	Name	Hour	Efficiency			(lbs/gal)
381761	Ready Mix 3.5 M6466	0.1808	75%	10.65	65.78%	7.01
381762	Ready Mix 3.5 FLNA40703M6466	0.3466	75%	10.62	65.91%	7.00
399093	3.5 System A3.5 Activator	0.1741	75%	8.74	61.00%	5.33
390836	Autoclear HS & LV Clearcoat	0.0657	75%	9.57	40.30%	3.86
390837	Autoclear HS & LV Hardener	0.0219	75%	10.55	41.25%	4.35
390838	Activ LV Std Thinner	0.0437	75%	9.49	12.83%	1.22
391082	Autocoat BT 300 Binder Q10RV	0.1120	75%	7.66	17.13%	1.31
387160	Standard Hardener	0.0112	75%	8.45	49.70%	4.20
391064	High Performance Reducer	0.0616	75%	7.35	0.00%	0.00
382512	Colorbuild 2.1/2.8 Black Primer	0.1439	75%	13.60	58.00%	7.89
384225	Colorbuild 2.1/2.8 Hardener	0.0360	75%	10.45	37.82%	3.95
391203	2.1/2.8 Primer Sealer Activator	0.1060	75%	9.97	0.87%	0.09
386258	2.1/2.8 Primer Surf Activator	0.0285	75%	10.29	0.00%	0.00

		Uncontrolled PTE				Controlled PTE			
		PM	PM-10	PM	PM-10	PM	PM-10	PM	PM-10
Emission Unit	Name	lb/hr	lb/hr	ton/year	ton/year	lb/hr	lb/hr	ton/year	ton/year
PB1 & P4	Ready Mix 3.5 M6466	0.950	0.950	4.161	4.161	0.0190	0.0190	0.083	0.083
PB1 & P4	Ready Mix 3.5 FLNA40703M6466	1.819	1.819	7.967	7.967	0.0364	0.0364	0.159	0.159
PB1 & P4	3.5 System A3.5 Activator	0.696	0.696	3.049	3.049	0.0139	0.0139	0.061	0.061
PB1 & P4	Autoclear HS & LV Clearcoat	0.190	0.190	0.833	0.833	0.0038	0.0038	0.017	0.017
PB1 & P4	Autoclear HS & LV Hardener	0.071	0.071	0.313	0.313	0.0014	0.0014	0.006	0.006
PB1 & P4	Activ LV Std Thinner	0.040	0.040	0.175	0.175	0.0008	0.0008	0.003	0.003
PB1 & P4	Autocoat BT 300 Binder Q10RV	0.110	0.110	0.483	0.483	0.0022	0.0022	0.010	0.010
PB1 & P4	Standard Hardener	0.035	0.035	0.154	0.154	0.0007	0.0007	0.003	0.003
PB1 & P4	High Performance Reducer	0.000	0.000	0.000	0.000	0.0000	0.0000	0.000	0.000
PB1 & P4	Colorbuild 2.1/2.8 Black Primer	0.851	0.851	3.729	3.729	0.0170	0.0170	0.075	0.075
PB1 & P4	Colorbuild 2.1/2.8 Hardener	0.107	0.107	0.467	0.467	0.0021	0.0021	0.009	0.009
PB1 & P4	2.1/2.8 Primer Sealer Activator	0.007	0.007	0.030	0.030	0.0001	0.0001	0.001	0.001
PB1 & P4	2.1/2.8 Primer Surf Activator	0.000	0.000	0.000	0.000	0.0000	0.0000	0.000	0.000
	Total	**4.88**	**4.88**	**21.36**	**21.36**	**0.098**	**0.098**	**0.427**	**0.427**

NOTES:

1. *Emissions are conservatively estimated by assuming the maximum amount of material removed from the vehicles is equal to the amount of solids in surface coatings that are applied to the painted exterior surfaces of the vehicles. Coatings applied to frames and rocker panels and undercoating are not included, since no surface prep activities are associated with these areas.

2. Emissions are based upon a maximum of 0.65 vehicles per hour.
Turtle Top processes vehicles through the surface prep and paint shop ranging in size from 3.2 to 12.1 tons. The average vehicle weight is 5.2 tons.
At a process rate of 0.65 vehicles per hour the material process rate for surface prep ranges from 2.08 to 7.87 tons/hour and averages 3.38 tons/hour.

3. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

Methodology:
Manufacturer rated filter efficiency = 98%
PM = PM10 lbs/hr = (gals/hr) x (lbs solids/gal) x (%Transfer Effeciency/100%)
PM = PM10 (after controls) tons/yr = [(lbs/hr) x ((100-%filter efficiency)/100)* [(8760 hrs/yr)/[2000lbs/ton]

Appendix A: Emissions Calculations
Particulate
Band saw operation

Company Name: Independent Protection Co., Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP No.: F039-10339-00048
Significant Permit Revision No. : 039-26080-00448
Reviewer: Swarna Prabha

Pollutant	Band Saw Capacity	Emission Factor*	PTE PM	PTE PM10
	inches/hr cut	lb/1000 "	tons/yr	tons/yr
PM	577	0.0039	0.0099	0.0099
PM10	577	0.0039	0.0099	0.0099

EMISSION FACTORS:

1. *Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8mm thick rather than 1 and the maximum metal thickness is not used in calculating the emissions.
2. Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick Machine Operations Sawing (general): Source Classification Code 3-09-030-05
3. A cross cut band saw used to cut 1"x 1" and 1" x 2" 14-gauge (0.083 inch) steel tubing.
4. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

Methodology:
PM/PM10 (lb/hr) = (max. inches cut/hour) x (emission factor)/(1000 inches)
PM/PM10 (tons/yr) = (lbs emissions/hour) x (8760 hrs/yr)/ (2000 lbs/ton)

Appendix A: Emissions Calculations
VOCs, Particulate, HAPs
Natural Gas Combustion
MM BTU/HR <100

Company Name: Independent Protection Co., Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP No.: F039-10339-00048
Significant Permit Revision No. 039-26080-00448
Reviewer: Swarna Prabha

Pollutant	PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	0.6	100	5.5	84.0
Lo Nox Emission Factor (lb/MMCF)				50		

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission tons/year PM*	tons/year PM10*	tons/year SO2	tons/year NOx**	tons/year VOC	tons/year CO
Air Make-up Unit (PBH1& 2) in PB1(Lo Nox)	2	2.000	4.000	35.04	0.033	0.13	0.011	1.8	0.096	1.5
Space Heaters (H36-38) Building #5 (Low Nox)	3	0.125	0.375	3.29	0.003	0.01	0.001	0.1	0.009	0.1
Air Make-up Units (H39) Building #5	1	1.500	1.500	13.14	0.012	0.05	0.004	0.3	0.036	0.6
Air Make-up Heater FH1 (Booth PB2)(Low Nox)	1	2.700	2.700	23.65	0.022	0.09	0.007	0.6	0.065	1.0
Space Heaters (H40-42) Building #7	3	0.120	0.360	3.15	0.003	0.01	0.001	0.1	0.009	0.1
Space Heaters (H43-44) Building #7	2	0.170	0.340	2.98	0.003	0.01	0.001	0.1	0.008	0.1
Space Heaters (H45) Building #3	1	1.250	1.250	10.95	0.010	0.04	0.003	0.3	0.030	0.5
Totals	**13**		**10.53**	**92.2**	**0.09**	**0.35**	**0.03**	**3.18**	**0.25**	**3.87**

Pollutant	Benzene	Formaldehyde	Hexane	Toluene	Cd	Cr	Ni
Emission Factor (lb/MMCF)	2.1E-03	7.5E-02	1.8E+00	3.4E-03	1.1E-03	1.4E-03	2.1E-03

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission tons/yr Benzene	tons/yr Formaldehyde	tons/yr Hexane	tons/yr Toluene	tons/yr Cd	tons/yr Cr	tons/yr Ni
Air Make-up Unit (PBH1& 2) in PB1(Lo Nox)	2	2.000	4.000	35.04	3.7E-05	1.3E-03	3.2E-02	6.0E-05	1.9E-05	2.5E-05	3.7E-05
Space Heaters (H36-38) Building #5 (Low Nox)	3	0.125	0.375	3.29	3.4E-06	1.2E-04	3.0E-03	5.6E-06	1.8E-06	2.3E-06	3.4E-06
Air Make-up Units (H39) Building #5	1	1.500	1.500	13.14	1.4E-05	4.9E-04	1.2E-02	2.2E-05	7.2E-06	9.2E-06	1.4E-05
Air Make-up Heater FH1 (Booth PB2)(Low Nox)	1	2.700	2.700	23.65	2.5E-05	8.9E-04	2.1E-02	4.0E-05	1.3E-05	1.7E-05	2.5E-05
Space Heaters (H40-42) Building #7	3	0.120	0.360	3.15	3.3E-06	1.2E-04	2.8E-03	5.4E-06	1.7E-06	2.2E-06	3.3E-06
Space Heaters (H43-44) Building #7	2	0.170	0.340	2.98	3.1E-06	1.1E-04	2.7E-03	5.1E-06	1.6E-06	2.1E-06	3.1E-06
Space Heaters (H45) Building #3	1	1.250	1.250	10.95	1.1E-05	4.1E-04	9.9E-03	1.9E-05	6.0E-06	7.7E-06	1.1E-05
Totals	**13**		**10.53**	**92.2**	**9.7E-05**	**3.5E-03**	**8.3E-02**	**1.6E-04**	**5.1E-05**	**6.5E-05**	**9.7E-05**

1. *PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
2. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5
3. **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
4. The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

Potential Throughput (MMCF) = Combined Total Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) / 2,000 lb/ton

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)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC - Volatile Organic Compounds
CO = Carbon Monoxide
Cr = Chromium
Ni = Nickel
Cd = Cadmium

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

Twenty Eight (28) Space Heaters

Company Name: Independent Protection Co., Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP No.: F039-10339-00048
Significant Permit Revision No.: 039-26080-00448
Reviewer: Swarna Prabha

Heat Input Capacity MMBtu/hr***	Potential Throughput MMCF/yr
4.387	38.4

	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	0.15	0.01	1.92	0.11	1.61

1. *PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
2. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5
3. **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
4. *** Existing space heaters (total heating capacity of 0.8 MMBtu were destroyed as a result of fire of 2006-2007)

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
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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

Twenty Eight (28) Space Heaters

Company Name: Independent Protection Co., Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP No.: F039-10339-00048
Significant Permit Revision No.: 039-26080-00448
Reviewer: Swarna Prabha

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	4.035E-05	2.306E-05	1.441E-03	3.459E-02	6.533E-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	9.608E-06	2.114E-05	2.690E-05	7.302E-06	4.035E-05

Methodology is the same as page 9.

The five highest organic and metal HAPs emission factors are provided above.

Appendix A: Emission Calculations
Wood Working
Company Name: Independent Protection Company, Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP : 039-10339-00448
Significant Permit Revision No.: 039-26080-00448
Reviewer: Swarna Prabha

Uncontrolled Potential Emissions (tons/year)					
A. Cyclone					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (Square Feet) (ACFM)	Control Efficiency	Total (tons/yr)
P2	1	0.10	2200.0	90.00%	82.59
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					**82.59**

Controlled Potential Emissions (tons/year)					
A. Cyclone					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (Square Feet) (ACFM)	Control Efficiency	Total (tons/yr)
P2	1	0.10	2200.0	90.00%	8.26

There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

Methodology:
Potential (uncontrolled):
Emissions rate (PM) = PM after controls (ton/yr)/(1-control efficiency)

Potential (controlled):

Emissions rate (PM) = Grain loading per actual cubic foot of air outlet (gr/cf)*Air flow rate in actual cubic feet per minute*60 minutes per hour/7000 grains per pound/2000pounds*8760 hours per year.

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Independent Protection Company, Inc.
Address City IN Zip: 67819 State Road 15, New Paris, IN
FESOP : 039-10339-00448
Significant Permit Revision No.: 039-26080-00448
Reviewer: Swarna Prabha

PROCESS	Number of Stations	Max. electrode consumption per station		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
WELDING		(lbs/hr)		PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Submerged Arc	0			0.036				0.000	0	0.000	0	0.000
Metal Inert Gas (MIG)(ER51	11	1.92		0.0241	3.4E-05		0.00001	0.509	0.000718	0.000	0.000211	0.001
Stick (E7018 electrode)				0.0211				0.000	0	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0			0.0055				0.000	0	0.000	0	0.000
Oxyacetylene(carbon steel)	0			0.0055				0.000	0	0.000	0	0.000
								0.000	0	0.000	0	0.000

	Number of Stations	Max. Metal Thickness Cut	Max. Metal Cutting Rate	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)				EMISSIONS (lbs/hr)				TOTAL HAPS (lb/hr)
FLAME CUTTING		(in.)	(in./minute)	PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma	0	0	0					0.000	0.000	0.000	0.000	0.000

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr	0.51	0.00	0.00	0.00	0.00
Potential Emissions lbs/day	12.22	0.02	0.00	0.01	0.02
Potential Emissions tons/year	**2.23**	0.00	0.00	0.00	0.00

There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).
Welding and other flame cutting emission factors are from an internal training session document.
See AP-42, Chapter 12.19 for additional emission factors for welding.