



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: June 18, 2008

RE: Jasper Plastics Solutions / 085-26216-00013

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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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New Source Construction and Part 70 Operating Permit OFFICE OF AIR QUALITY

J.P., Inc. d/b/a Jasper Plastics Solutions
501 West Railroad Ave.
Syracuse, Indiana 47567

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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.

Operation Permit No.: T085-26216-00013	
Issued by/Original Signed By:	Issuance Date: June 18, 2008
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: June 18, 2013

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary manufacturing and surface coating of faux wood, plastic furniture and miscellaneous plastic parts operation.

Source Address:	501 West Railroad Ave., Syracuse, IN 46567
Mailing Address:	1220 Power Drive, Jasper, IN 47546
General Source Phone Number:	(574) 903-1339
SIC Code:	3089
NAICAA Code:	337215
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Twenty-nine (29) spray booths, identified as SB1 through SB29, approved for construction in 2008, using HVLP guns to coat molded plastic or wood parts, using dry filters for particulate control, and exhausting to stacks identified as SBS1 through SBS29.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) 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, including the following:

One (1) department for Urethane Machining/Woodworking Operations, identified as UM, approved for construction in 2008, with a capacity of 1450 pounds of molded urethane and 500 pounds of wood per hour, and with particulate emissions controlled by the following:

- (1) One (1) Donaldson Day 156-RFH-10 unit, identified as DC1, approved for construction in 2008, and venting inside the building.
- (2) One (1) Torit Day 276 RFW unit, identified as DC2, approved for construction in 2008, and venting inside the building.

- (3) One (1) Murphy Rodgers – MRAL-14 unit, identified as DC3, approved for construction in 2008, and venting inside the building.
- (b) Activities or categories of activities with individual HAP emissions not previously identified as any unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP.
 - (1) Plastics molding and crosslinking with emission less than 0.5 tons per year and consisting of:
 - (A) Four (4) mixing tanks identified as MT1 through MT4, with a maximum capacity of 375 lb/hr, each.
 - (B) Six (6) pouring machines identified as P1 through P6, with maximum capacity of 250 lb/hr, each.
 - (C) Molding operations identified as MO1, with a total maximum capacity of 1,450 lb/hr, and exhausting to stacks identified as SBS1 through SBS29.

Note: Molding prep work occurs in spray booths SB1 through SB29. Upon completion the molds move to department UM, and then return to spray booths SB1 through SB29 for completion.
 - (2) Three (3) bulk storage tanks, identified as PT1, PT2, and PT3, with a capacity of 5,000 gallons, each, used for storing plastics, and venting through PTV 1, PTV2, and PTV3.
 - (3) Two (2) storage tanks, identified as IT1 and IT2, with a capacity of 5,000 gallons, each, used for storing plastics, and venting through ITV1 and ITV2.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

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

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T085-26216-00013, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.6 Enforceability [326 IAC 2-7-7]

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

B.7 Severability [326 IAC 2-7-5(5)]

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

B.8 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-7-5(6)(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 the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance

causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-16]

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-4(c)(9) 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 2-7 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 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T085-26216-00013 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.17 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.18 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.19 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.20 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.22 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.24 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.27 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

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

C.2 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.9 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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 the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

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

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Twenty-nine (29) spray booths, identified as SB1 through SB29, approved for construction in 2008, using HVLP guns to coat molded plastic or wood parts, using dry filters for particulate control, and exhausting to stacks identified as SBS1 through SBS29.

Insignificant Activities:

- (b) Activities or categories of activities with individual HAP emissions not previously identified as any unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP.
- (1) Plastics molding and crosslinking with emission less than 0.5 tons per year and consisting of:
- (A) Four (4) mixing tanks identified as MT1 through MT4, with a maximum capacity of 375 lb/hr, each.
 - (B) Six (6) pouring machines identified as P1 through P6, with maximum capacity of 250 lb/hr, each.
 - (C) Molding operations identified as MO1, with a total maximum capacity of 1,450 lb/hr, and exhausting to stacks identified as SBS1 through SBS29.

Note: Molding prep work occurs in spray booths SB1 through SB29. Upon completion the molds move to department UM, and then return to spray booths SB1 through SB29 for completion.

(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 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration (PSD) Minor Limit for Volatile Organic Compounds (VOC) [326 IAC 2-2]

The input of VOC delivered to the applicators of spray booths SB1 through SB29 (including wood and plastic coatings and solvents) and plant-wide clean-up solvent usage shall be less than 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, in conjunction with the potential to emit VOC from the plastics molding operations, shall limit the VOC from the entire source to less than 250 tons per year, and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Single and Combined Hazardous Air Pollutant (HAP) Limits

The input of HAPs delivered to the applicators of Booths SB1 through SB29 (including wood and plastic coatings and solvents) and plant-wide clean-up solvent usage shall be less than nine and eight-tenths (9.80) tons of any single HAP and less than twenty-four and eight-tenths (24.80) tons of a combinations of HAPs per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, in conjunction with the potential to emit HAPs from the plastics molding operations, shall limit the HAPs from the entire source to less than ten (10) tons of any single HAP and less than twenty-five (25) tons of a combination of HAPs. Therefore, pursuant to 40 CFR 63.41, this source is not considered a major source under Section 112 of the Clean Air Act (CAA).

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets by spray booths (SB1 through SB29), with the exception of no more than ten (10) gallons per day used for touch-up and repair operations, shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

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

Pursuant to 326 IAC 6-3-2(d), particulate from spray booths SB1 through SB29 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.1.6 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 stacks (SB1 through SB29) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 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 (3). Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage 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 VOC content of each coating material and solvent used less water on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The amount HAP content of each coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC, single HAP and total HAPs usages for each month.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections. The Permittee shall included in its daily record when a daily inspection is not performed and the reason for the lack of an inspection (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) 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, including the following:

One (1) department for Urethane Machining/Woodworking Operations, identified as UM, approved for construction in 2008, with a capacity of 1450 pounds of molded urethane and 500 pounds of wood per hour, and with particulate emissions controlled by the following:

- (1) One (1) Donaldson Day 156-RFH-10 unit, identified as DC1, approved for construction in 2008, and venting inside the building.
- (2) One (1) Torit Day 276 RFW unit, identified as DC2, approved for construction in 2008, and venting inside the building.
- (3) One (1) Murphy Rodgers – MRAL-14 unit, identified as DC3, approved for construction in 2008, and venting 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 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Urethane Machining/Woodworking Operations (UM) facilities shall not exceed 4.03 pounds per hour when operating at a process weight rate of 1950 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with Condition D.1.1, the dust collectors (DC1, DC2, and DC3) for particulate control shall be in operation and control emissions from the Urethane Machining/Woodworking Operations (UM) facility at all times the facility is in operation.

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

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

D.2.4 Broken or Failed Bag Detection

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 501 West Railroad Ave., Syracuse, IN 46567
Mailing Address: 1220 Power Drive, Jasper, IN 47546
Part 70 Permit No.: T085-26216-00013

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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 501 West Railroad Ave., Syracuse, IN 46567
Mailing Address: 1220 Power Drive, Jasper, IN 47546
Part 70 Permit No.: T085-26216-00013

This form consists of 2 pages

Page 1 of 2

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

Part 70 Quarterly Report

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Source Address: 501 West Railroad Ave., Syracuse, IN 46567
Mailing Address: 1220 Power Drive, Jasper, IN 47546
Part 70 Permit No.: T085-26216-00013
Facility: Spray booths SB1 through SB29, and plant-wide clean-up solvent usage
Parameter: VOC usage
Limit: The input of VOC delivered to the applicators of spray booths SB1 through SB29 (including wood and plastic coatings and solvents) and plant-wide clean-up solvent usage shall be less than 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
 Source Address: 501 West Railroad Ave., Syracuse, IN 46567
 Mailing Address: 1220 Power Drive, Jasper, IN 47546
 Part 70 Permit No.: T085-26216-00013
 Facility: Spray booths SB1 through SB29, and plant-wide clean-up solvent usage
 Parameter: Single HAP and total HAP usage
 Limit: The input of HAPs delivered to the applicators of Booths SB1 through SB29 (including wood and plastic coatings and solvents) and plant-wide clean-up solvent usage shall be less than nine and eight-tenths (9.80) tons of any single HAP and less than twenty-four and eight-tenths (24.80) tons of a combinations of HAPs per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: J.P., Inc. d/b/a Jasper Plastics Solutions
 Source Address: 501 West Railroad Ave., Syracuse, IN 46567
 Mailing Address: 1220 Power Drive, Jasper, IN 47546
 Part 70 Permit No.: T085-26216-00013

Months: _____ to _____ Year: _____

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

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

J.P., Inc. d/b/a Jasper Plastics Solutions
501 West Railroad Ave.
Syracuse, Indiana 47567

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that J.P., Inc. d/b/a Jasper Plastics Solutions, 501 West Railroad Ave., Syracuse, Indiana 47567, completed construction of the faux woods and miscellaneous plastic parts production facility on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on March 6, 2008 and as permitted pursuant to New Source Construction Permit and Part 70 Operating Permit No. T085-26216-00013, Plant ID No. 085-00013 issued on _____.
5. Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires:

Signature _____

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Part 70 Permit

Source Description and Location

Source Name:	J.P., Inc. d/b/a Jasper Plastics Solutions
Source Location:	501 West Railroad Avenue, Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3089
NAICSS Code	337215
Operation Permit No.:	T 085-26216-00013
Permit Reviewer:	Jenny Acker

Source Definition

The Better Way Partners, LLC dba Better Way Products plant, source number 085-00114, will be located in the same building as the Castle BWP, LLC plant (Castle), source number 085-00111 and the J. P., Inc. dba Jasper Plastic Solutions plant (Jasper), source number 085-00013. IDEM, OAQ examined whether these plants should be considered one "major source" as defined at 326 IAC 2-7-1(22). In order for these plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for one or both of the others; and,
- (3) the plants must be located on contiguous or adjacent properties.

The Better Way and Castle plants are under common ownership and common control. Clint Decker is the responsible official for both plants. Some of the production managers for Better Way may also manage production at Castle. However, the Jasper plant is owned and controlled by a separate corporation unrelated to Better Way and Castle.

All three plants have the same two-digit SIC code, 30, for Rubber and Miscellaneous Plastic Products.

All three plants will be located on the same property. IDEM, OAQ finds that the Better Way plant and the Castle plant are one major source. IDEM, OAQ further finds that the Jasper plant is not part of the Better Way and Castle major source and Jasper will be issued a separate Part 70 operating permit.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Designation
SO2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM10	Unclassifiable effective November 15, 1990.
NO2	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005 Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Kosciusko County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(c) Other Criteria Pollutants

Kosciusko County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM₁₀, NO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed a new source construction application, submitted by J.P., Inc. d/b/a Jasper Plastics Solutions on March 6, 2008, relating to a stationary manufacturing and surface coating of faux wood, plastic furniture, and miscellaneous plastic parts operation. The following is a list of the proposed emission units and pollution control devices:

- (a) Twenty-nine (29) spray booths, identified as SB1 through SB29, approved for construction in 2008, using HVLP guns to coat molded plastic or wood parts, using dry filters for particulate control, and exhausting to stacks identified as SBS1 through SBS29.

Insignificant Activities

- (a) 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, including the following:

One (1) department for Urethane Machining/Woodworking Operations, identified as UM, approved for construction in 2008, with particulate emissions controlled by the following:

- (1) One (1) Donaldson Day 156-RFH-10 unit, identified as DC1, approved for construction in 2008, and venting inside the building.
- (2) One (1) Torit Day 276 RFW unit, identified as DC2, approved for construction in 2008, and venting inside the building.
- (3) One (1) Murphy Rodgers – MRAL-14 unit, identified as DC3, approved for construction in 2008, and venting inside the building.
- (b) Activities or categories of activities with individual HAP emissions not previously identified as any unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP.
- (1) Plastics molding and crosslinking with emission less than 0.5 tons per year and consisting of:
- (A) Four (4) mixing tanks identified as MT1 through MT4, with a maximum capacity of 375 lb/hr, each.
- (B) Six (6) pouring machines identified as P1 through P6, with maximum capacity of 250 lb/hr, each.
- (C) Molding operations identified as MO1, with a total maximum capacity of 1,450 lb/hr, and exhausting to stacks identified as SBS1 through SBS29.
- Note: Molding prep work occurs in spray booths SB1 through SB29. Upon completion the molds move to department UM, and then return to spray booths SB1 through SB29 for completion.
- (2) Three (3) bulk storage tanks, identified as PT1, PT2, and PT3, with a capacity of 5,000 gallons, each, used for storing plastics, and venting through PTV 1, PTV2, and PTV3.

- (3) Two (2) storage tanks, identified as IT1 and IT2, with a capacity of 5,000 gallons, each, used for storing plastics, and venting through ITV1 and ITV2.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

Trivial Activities

- (a) Activities related to ventilation, venting equipment and refrigeration, including the following:
 - (1) Air vents from air compressors.
- (b) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process including the following:
 - (1) Manual tank gauging.
- (c) Lawn care and landscape maintenance activities and equipment, including the storage, spraying or application of insecticides, pesticides and herbicides.
- (d) Pressurized storage tanks and associated piping for liquid petroleum gas (LPG) used for lift trucks.
- (e) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed except when the material is added or removed.
- (f) Emergency and standby equipment including:
 - (1) Process safety relief devices installed solely for the purpose of minimizing injury to persons or damage to equipment which could result from abnormal process operating conditions, including safety relief valves.
- (g) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities including portable dust collectors.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temp (°F)
PTV1	Plastic Storage Tank	24	0.33	<1	86
PTV2	Plastic Storage Tank	24	0.33	<1	86
PTV3	Plastic Storage Tank	24	0.33	<1	86
ITV1	Plastic Storage Tank	24	0.33	<1	86
ITV2	Plastic Storage Tank	24	0.33	<1	86

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temp (°F)
SBS1	Spray Booth SB1	26	30	15,000	86
SBS2	Spray Booth SB2	26	30	15,000	86
SBS3	Spray Booth SB3	26	30	15,000	86
SBS4	Spray Booth SB4	26	30	15,000	86
SBS5	Spray Booth SB5	26	30	15,000	86
SBS6	Spray Booth SB6	26	30	15,000	86
SBS7	Spray Booth SB7	26	30	15,000	86
SBS8	Spray Booth SB8	26	30	15,000	86
SBS9	Spray Booth SB9	26	30	15,000	86
SBS10	Spray Booth SB10	26	30	15,000	86
SBS11	Spray Booth SB11	26	30	15,000	86
SBS12	Spray Booth SB12	26	30	15,000	86
SBS13	Spray Booth SB13	26	30	15,000	86
SBS14	Spray Booth SB14	26	30	15,000	86
SBS15	Spray Booth SB15	26	30	15,000	86
SBS16	Spray Booth SB16	26	30	15,000	86
SBS17	Spray Booth SB17	26	30	15,000	86
SBS18	Spray Booth SB18	26	30	15,000	86
SBS19	Spray Booth SB19	26	30	15,000	86
SBS20	Spray Booth SB20	26	30	15,000	86
SBS21	Spray Booth SB21	26	30	15,000	86
SBS22	Spray Booth SB22	26	30	15,000	86
SBS23	Spray Booth SB23	26	30	15,000	86
SBS24	Spray Booth SB24	26	30	15,000	86
SBS25	Spray Booth SB25	26	30	15,000	86
SBS26	Spray Booth SB26	26	30	15,000	86
SBS27	Spray Booth SB27	26	30	15,000	86
SBS28	Spray Booth SB28	26	30	15,000	86
SBS29	Spray Booth SB29	26	30	15,000	86

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

PTE Before Controls	
Pollutant	Potential To Emit (ton/yr)
PM	90.40
PM ₁₀	90.40
SO ₂	0.00
VOC	245.46
CO	0.00
NO _x	0.00

HAP PTE Before Controls	
HAPs	Potential To Emit (ton/yr)
Ethyl Benzene	2.06
Formaldehyde	0.03
Isocyanate	0.10
MIBK	0.45
Toluene	19.03
Xylene	13.56
TOTAL	35.13

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of Volatile Organic Compounds (VOC) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Permit Level Determination – PSD or Emission Offset
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The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Potential to Emit (ton/yr)					
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x
Polyol/Isocyanate Storage Tanks	0.0	0.0	0.0	0.02	0.0	0.0
Molding Operations (MO)	0.0	0.0	0.0	0.19	0.0	0.0
Urethane Machining/Woodworking Operations (UM)	0.68	0.68	0.0	0.0	0.0	0.0
Spray Booths (SB1 through SB29)	2.23	2.23	0.0	¹⁾ 245.0	0.0	0.0
Total	2.90	2.90	0.0	245.21	0.0	0.0
Major Source Threshold	250	250	250	250	250	250

¹⁾ Although the calculated potential emissions are 245.24 tpy, the calculation is based on anticipated coating usage and VOC input to the booths and is not constrained by physical limitation of the booths. Since the potential to emit of VOC from the entire source is greater than 98% of the major source threshold, a limit has been imposed on Spray Booths (SB1 through SB2) to ensure the source remains minor under PSD.

- (a) This proposed stationary source will not be major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability Determination

The following federal rules are applicable to the source:

NSPS:

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed new source.

NESHAP:

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed new source, because the source has elected to limit the PTE of any single HAP to less than ten (10) tons per year and the PTE of a combination of HAPs to less than twenty-five (25) tons per year.

CAM:

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified emission unit that involves a pollutant-specific emission unit and meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and

- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Chemical Storage – VOC	None	N	<100	<100	100	N	N
Urethane Machining (UM) – PM/PM10	DC1 – DC3	Y	<100	<100	100	N	N
Each Spray Booth (SB1 - SB29) -VOC	None	Y	< 100	< 100	100	N	N
Each Spray Booth (SB1 - SB29) - PM/PM10	Dry Filter	Y	< 100	< 100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this new source construction permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

The potential to emit (PTE) of volatile organic compounds (VOC) of this new source construction is calculated to be less than 250 tons per year. However, the PTE of VOC from the surface coating operations is based on the worst case of the anticipate coatings (highest VOC content) and the anticipated maximum throughput. Since this methodology is does not provide an absolute PTE, a VOC usage limit is necessary to ensure the source remains a PSD minor source. The Permittee has accepted limits on the VOC emissions, such that the VOC emissions are less than 250 tons per month. The source is limited as follows:

The input of VOC delivered to the applicators of spray booths SB1 through SB29 (including wood and plastic coatings and solvents) and plant-wide clean-up solvent usage shall be less than 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, in conjunction with the potential to emit VOC from the plastics molding operations, is necessary to limit the VOC from the entire source to less than 250 tons per year, and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

The operation of the Storage Tanks, Molding Operations, Urethane Machining/Woodworking Operations, and the Spray Booths, combined, will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2010, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

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

- (a) Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) from spray booths SB1 through SB29 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The source shall operate the control device in accordance with manufacturer's specifications.

The source has opted to install dry particulate filters.

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Urethane Machining/Woodworking Operations (UM) shall not exceed 4.03 pounds per hour when operating at a process weight rate of 1950 pounds 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:

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

The dust collectors DC1, DC2, and DC3 shall be in operation at all times the Urethane Machining/Woodworking Operations (UM) is in operation, in order to comply with this limit.

- (c) The Molding Operation (MO) does not utilize spray technology. The urethane is poured (flow coating), brushed and rolled onto the molds. Therefore, pursuant to 326 IAC 6-3-2(b), the molding operation is exempt from the requirements of 326 IAC 6-3-2.

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

This rule applies to facilities constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year that are not otherwise regulated by other provisions of Article 8 of

326 IAC. The spray booths (SB1 – SB29) are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Therefore the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-10 (Flat Wood Panel Manufacturing Operations):

The requirements of 326 IAC 8-2-10 do not apply to the wood coating operation because the wood being coated is wood furniture, not wood paneling as described in 326 IAC 8-2-10(a)(1), (2), and (3).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This source is subject to 326 IAC 8-2-12 for the spray booths (SB1 – SB29) when coating wood furniture components or wood furnishings, since they are facilities of the type described in 326 IAC 8-2-12 that were constructed after July 1, 1990 and each booth has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets, with the exception of no more than ten (10) gallons per day used for touch-up and repair operations, shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Since J.P., Inc. d/b/a Jasper Plastics Solutions will use HVLP application, they will be able to comply with 326 IAC 8-2-12.

326 IAC 8-11 (Wood Furniture Coatings);

The requirements of 326 IAC 8-11 do not apply to the wood furniture coating operation because the source is not located in any of the applicable counties (Lake, Porter, Clark, and Floyd).

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this new source construction are as follows:

- (a) The following compliance determination requirements are applicable to the Urethane Machining/Woodworking Operations (UM) Operations:
 - (1) The dust collectors (DC1, DC2, and DC3) for particulate control shall be in operation and control emissions from the Urethane Machining/Woodworking Operations (UM) facility at all times the facility is in operation. In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

These requirements are required to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

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

- (a) The following compliance determination requirements are applicable to the Surface Coating Booths (SB1 through SB29):
 - (1) 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 stacks (SB1 through SB29) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit. 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.

These requirements are required to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

- (b) The following compliance determination requirements are applicable to the Urethane Machining/Woodworking Operations (UM) Operations:
 - (1) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee

satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These requirements are required to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed New Source Construction and Part 70 Operating Permit No. T085-26216-00013. The staff recommend to the Commissioner that this New Source Construction and Part 70 Operating Permit be approved.

**Appendix A: Emissions Calculations
Sourcewide Emission Summary**

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 W. Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit: T 085-26216-00013
Permit Reviewer: Jenny Acker
Date: March 12, 2008

Unit ID/Control Device	Process	Criteria Pollutants: Unrestricted Potential Emissions						Criteria Pollutants: After Controls Potential Emissions					
		Potential PM (tons/yr)	Potential PM10 (tons/yr)	Potential SO2 (tons/yr)	Potential NOx (tons/yr)	Potential VOC (tons/yr)	Potential CO (tons/yr)	Limited PM (tons/yr)	Limited PM10 (tons/yr)	Limited SO2 (tons/yr)	Limited NOx (tons/yr)	Limited VOC (tons/yr)	Limited CO (tons/yr)
PT1, PT2, PT3, IT1, IT2	Polyol/Isocyanate Storage Tanks	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.02	0.00
MO1	Molding Operations	0.00	0.00	0.00	0.00	0.19	0.00	0.00	0.00	0.00	0.00	0.19	0.00
UM	Urethane Machining	67.58	67.58	0.00	0.00	0.00	0.00	0.68	0.68	0.00	0.00	0.00	0.00
SB1 - SB29	Surface Coating	22.82	22.82	0.00	0.00	245.24	0.00	2.23	2.23	0.00	0.00	245.24	0.00
Sourcewide PTE (tons)		90.40	90.40	0.00	0.00	245.46	0.00	2.90	2.90	0.00	0.00	245.46	0.00

HAPs: Unrestricted Potential Emissions								
Unit ID	Process	Potential Ethyl Benzene Emissions (tons/yr)	Potential Formaldehyde Emissions (tons/yr)	Potential Isocyanate Emissions (tons/yr)	Potential MIBK Emissions (tons/yr)	Potential Toluene Emissions (tons/yr)	Potential Xylene Emissions (tons/yr)	Potential Total Emissions (tons/yr)
PT1, PT2, PT3, IT1, IT2	Polyol/Isocyanate Storage Tanks	0.00	0.00	0.0004	0.00	0.00	0.00	0.0004
MO1	Molding Operations	0.00	0.00	0.10	0.00	0.00	0.00	0.00
UM	Urethane Machining	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SB1 - SB29	Surface Coating	2.06	0.03	0.00	0.45	19.03	13.56	35.13
Sourcewide PTE (tons)		2.06	0.03	0.10	0.45	19.03	13.56	35.13

**Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Operations from 29 Spray Booths (SB1 to SB29)**

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 West Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit: T 085-26216-00013
Permit Reviewer: Jenny Acker
Date: March 12, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt Organics	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Usage (gal/unit)	Maximum Production (units/hr)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency			
Mold Cleaner CX-500	7.01	100.00%	0.00%	100.00%	0.00%	0.00%	0.0028	145.00	0.4060	7.01	7.01	2.85	68.31	12.47	0.00	N/A	100%			
Mold Release Black	7.81	77.80%	0.90%	76.90%	1.10%	13.60%	0.0069	145.00	1.0005	6.07	6.01	6.01	144.21	26.32	0.00	44.16	100%			
Butyl Acetate (Cleanup)	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.0024	145.00	0.3480	7.31	7.31	2.54	61.05	11.14	0.00	N/A	100%			
Reducer R7K305	7.25	100.00%	0.00%	100.00%	0.00%	0.00%	0.0029	145.00	0.4205	7.25	7.25	3.05	73.17	13.35	0.00	N/A	75%			
American Oak	8.32	69.90%	1.00%	68.90%	1.20%	15.10%	0.0422	145.00	6.1190	5.80	5.73	35.08	841.85	153.64	16.78	37.96	75%			
Precat Lacquer 24252	7.83	77.70%	0.00%	77.70%	0.00%	13.87%	0.0058	145.00	0.8410	6.08	6.08	5.12	122.80	22.41	1.61	43.86	75%			
Urethane Catalyst 4970	8.87	25.00%	0.00%	25.00%	0.00%	69.48%	0.0042	145.00	0.6090	2.22	2.22	1.35	32.41	5.92	4.44	3.19	75%			
Total Uncontrolled Potential Emissions													55.99	1,343.80	245.24	22.82				

Capture Efficiency: 0.00% 95.00%
Control Efficiency: 0.00% 95.00%
Overall Control Efficiency: 0.00% 90.25%
245.24 2.23

Post Control Emission Rate (tpy)

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 hrs/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)

Hazardous Air Pollutants

Material	Density (Lb/Gal)	Usage (gal/unit)	Maximum Production (units/hr)	Weight % Ethyl Benzene	Weight % Formaldehyde	Weight % MIBK	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (tpy)	Formaldehyde Emissions (tpy)	MIBK Emissions (tpy)	Toluene Emissions (tpy)	Xylene Emissions (tpy)	Total HAP (tpy)
Mold Cleaner CX-500	7.01	0.0028	145.00	0.00%	0.00%	0.00%	30.00%	30.00%	0.00	0.00	0.00	3.74	3.74	7.48
Mold Release Black	7.81	0.0069	145.00	0.90%	0.00%	0.00%	6.00%	5.00%	0.31	0.00	0.00	2.05	1.71	4.07
Butyl Acetate (Cleanup)	7.31	0.0024	145.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Reducer R7K305	7.25	0.0029	145.00	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.00	0.00	2.67	0.00	2.67
American Oak	8.32	0.0422	145.00	0.40%	0.00%	0.00%	4.00%	2.00%	0.89	0.00	0.00	8.92	4.46	14.27
Precat Lacquer 24252	7.83	0.0058	145.00	1.05%	0.12%	6.80%	5.71%	4.44%	0.30	0.03	0.45	1.65	1.28	3.71
Urethane Catalyst 4970	8.87	0.0042	145.00	2.38%	0.00%	0.00%	0.00%	10.00%	0.56	0.00	0.00	0.00	2.37	2.93
Total Potential HAP Emissions (tons/year)									2.06	0.03	0.45	19.03	13.56	35.13

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) * 8760 (hrs/yr) * 1 (ton)/2000 (lbs)

**Process Particulate Emissions
Urethane Machining and Woodworking Operations (UM)**

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 W. Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit: T 085-26216-00013
Permit Reviewer: Jenny Acker
Date: March 12, 2008

Uncontrolled Potential Emissions (tons/year)							
Process	No. of Units	Airflow (acfm)	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total PM (tons/yr)
Urethane Machining w/DC1	1	4,000	0.0015	25.6	156.00	99.00%	22.53
Urethane Machining w/DC2	1	4,000	0.0015	14.5	276.00	99.00%	22.53
Urethane Machining w/DC3	1	4,000	0.0015	24.2	165.00	99.00%	22.53
Total Emissions Based on Rated Capacity at 8,760 Hours/Year (tons/year)							67.58
Total Emissions Based on Rated Capacity (lb/hr)							15.43
Controlled Potential Emissions (tons/year)							
Process	No. of Units	Airflow (acfm)	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total PM (tons/yr)
Urethane Machining w/DC1	1	4,000	0.00150	25.6	156.00	99.00%	0.23
Urethane Machining w/DC2	1	4,000	0.00150	14.5	276.00	99.00%	0.23
Urethane Machining w/DC3	1	4,000	0.00150	24.2	165.00	99.00%	0.23
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (tons/year)							0.68
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls (lb/hr)							0.15
				Urethane Machining w/DC1	Urethane Machining w/DC2	Urethane Machining w/DC3	
Allowable PM Emission (lb/hr) = 4.10 X [Process Weight Rate]^{0.67} =				2.37	2.45	0.69	
Material Input Rate (lb/hr) =				882.93	929.39	139.41	
Actual Post Control Emissions (lb/hr) =				0.05	0.05	0.05	
Methodology:							
Potential Emission (uncontrolled):							
Potential Emission(tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)]							
Potential Emission (controlled):							
Potential Emission (tons/yr) = [No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs]							

Appendix A: Emissions Losses From Five (5) Storage Tanks (ST)

Company Name: J.P., Inc. d/b/a Jasper Plastics Solutions
Address City IN Zip: 501 W. Railroad Ave., Syracuse, Indiana 46567
Part 70 Operating Permit: T 085-26216-00013
Permit Reviewer: Jenny Acker
Date: March 12, 2008

TANK BREATHING LOSSES - Three Polyol Tanks - PT1, PT2, PT3															
LB = (2.26 x 10 ⁻²) x (Mv) x (P ^{0.68}) x (D ^{1.73}) x (H ^{0.51}) x (T ^{0.50}) x (Fp) x (C) x (Kc) x %VOC															
Constant	Mv	Pex0.68	Dex1.73	Hex0.51	dTex0.50	Fp	C	Kc	Percent	Result	Result	Result	Result		
										VOC	Lb/Yr	Lb/Hr	Lb/Day	TPY	
0.0226	118.17	0.03	53.70	2.98	4.24	1.00	0.25	1.00	100.00%	15.52	0.0018	0.0425	0.0078		
WORKING LOSS															
LW = 2.4ex-5 Mv P V N Kn Kc %VOC															
Constant	Mv	P	V	N*	Kn	Kc	Percent					Result	Result	Result	Result
										VOC	Lb/Yr	Lb/Hr	Lb/Day	TPY	
0.000024	118.17	0.0007	5,000.00	47.04	1.00	1.0000	100.00%					0.47	0.00005	0.0013	0.0002
Total Losses per Tank										15.99	0.0018	0.0438	0.0080		
Total Losses for all Three (3) Tanks										47.96	0.01	0.13	0.02		
*N = Annual Usage (gal)/Tank Capacity/3 Tanks				47.04											
Annual Product Throughput (gal/yr)				705,666.67											

Total Emissions Losses as VOC - 1,6-Hexanediol

Result	Result	Result	Result
Lb/Yr	Lb/Hr	Lb/Day	TPY
47.96	0.01	0.13	0.02

TANK BREATHING LOSSES - Two (2) Isocyanate Tanks - IT1, IT2															
LB = (2.26 x 10 ⁻²) x (Mv) x (P ^{0.68}) x (D ^{1.73}) x (H ^{0.51}) x (T ^{0.50}) x (Fp) x (C) x (Kc) x %VOC															
Constant	Mv	Pex0.68	Dex1.73	Hex0.51	dTex0.50	Fp	C	Kc	Percent	Result	Result	Result	Result		
										VOC	Lb/Yr	Lb/Hr	Lb/Day	TPY	
0.0226	250.00	3.67E-04	53.70	2.98	4.24	1.00	0.25	1.00	100.00%	0.35	0.00004	0.0010	0.0002		
WORKING LOSS															
LW = 2.4ex-5 Mv P V N Kn Kc %VOC															
Constant	Mv	P	V	N*	Kn	Kc	Percent					Result	Result	Result	Result
										VOC	Lb/Yr	Lb/Hr	Lb/Day	TPY	
0.000024	250.00	8.8736E-06	5,000.00	61.42	1.00	1.0000	100.00%					0.02	1.87E-06	4.48E-05	8.18E-06
Total Losses per Tank										0.37	4.20E-05	1.01E-03	1.84E-04		
Total Losses for Two (2) Tanks										0.74	0.0001	0.002	0.0004		
*N = Annual Usage (gal)/Tank Capacity/2 Tanks				61.42											
Annual Product Throughput (gal/yr)				614,216.63											

Total Emissions Losses as MDI

Result	Result	Result	Result
Lb/Yr	Lb/Hr	Lb/Day	TPY
0.74	0.0001	0.002	0.0004

Methodology:

LB emissions equation from AP-42, Appendix C (4th Edition, September 1985)