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: August 6, 2008

RE: Complete Finish, Inc. / 033-26485-00083

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07

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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Complete Finish, Inc.
200 Parker Dr.
Ashley, Indiana 46705

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M033-26485-00083	
Issued by: Original signed by Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:July 6, 2008 Expiration Date:July 6, 2018

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary stationary metal and plastic parts painting.

Source Address:	200 Parker Dr., Ashley, Indiana 46705
Mailing Address:	827 CR 10, Corunna, IN 46730
General Source Phone Number:	260-587-3588
SIC Code:	3599
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) One (1) paint booth, identified as EU-01, constructed in 1996, equipped with air atomization spray applicators and dry filters for particulate control, exhausting to stack SV-01, with a coating capacity of two hundred (200) feet of metal pipe per hour.

(b) One (1) paint booth, identified as EU-02, constructed in 1996, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to stack SV-02, with a coating capacity of ten (10) units of metal and plastic parts per hour.

(c) One (1) paint booth, identified as EU-03, constructed in 2003, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to stack SV-03, with a coating capacity of two thousand five hundred (2,500) metal caps per hour.

(d) One (1) sandblaster, identified as SB-01, constructed in 1996, equipped with a torit dust collection system for PM control, exhausting outside, with a maximum throughput capacity of 500 pounds of metal and plastic parts per hour.

(e) Two (2) natural gas-fired make up air heaters, identified and H-07 and H-08, constructed in 1996, exhausting through stacks HV-07 and HV-08, respectively, each rated at 0.69 million British thermal unit per hour.

(f) One (1) natural gas-fired forced air heater, identified as H-06, constructed in 1996, exhausting through stack HV-06, rated at 0.1 million British thermal unit per hour.

(g) Five (5) natural gas-fired radiant heaters, identified as RH-01 through RH-05, constructed in 1996, exhausting to stacks HV-01 through HV-05, respectively, each rated at 0.15 million British thermal unit per hour.

(h) One (1) natural gas fired drying oven, constructed in 2003, rated at 0.0015 million British thermal unit per hour.

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

(a) This permit, M033-26485-00083, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

B.8 Certification

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

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

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

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) All terms and conditions of permits established prior to M033-26485-00083 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]

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

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

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

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

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

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

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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

(a) Violation of any conditions of this permit.

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control

requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

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

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

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

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

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

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

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

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required

monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.14 Response to Excursions or Exceedances

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 Malfunctions Report [326 IAC 1-6-2]

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

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

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

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

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

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) paint booth, identified as EU-01, constructed in 1996, equipped with air atomization spray applicators and dry filters for particulate control, exhausting to stack SV-01, with a coating capacity of two hundred (200) feet of metal pipe per hour.

(b) One (1) paint booth, identified as EU-02, constructed in 1996, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to stack SV-02, with a coating capacity of ten (10) units of metal and plastic parts per hour.

(c) One (1) paint booth, identified as EU-03, constructed in 2003, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to stack SV-03, with a coating capacity of two thousand five hundred (2,500) metal caps per hour.

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

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2(d)]

(a) Pursuant to 326 IAC 6-3-2(d), the particulate emissions from the three (3) paint booths, identified as EU-01 through EU-03, shall be controlled by the dry particulate filters, and the Permittee shall operate these dry particulate filters in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the dry particulate filters and do either of the following no later than four (4) hours after such observation:

(1) Repair the dry particulate filters so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, when coating metal.

(b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of paint booths, identified as EU-01 through EU-03, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

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

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.1.2(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.2(a), the Permittee shall maintain records in accordance with (1) and (2) below on daily basis. Records maintained for (1) and (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in Condition D.1.2(a).

(1) The VOC content of each coating, as received, and solvent used less water.

(A) Records shall include material safety data sheets (MSDS) necessary to verify the type of coating and solvent used.

(2) The VOC content of each coating, as applied.

(A) Records shall include type and amount of solvent added to each coating for dilution.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(d) One (1) sandblaster, identified as SB-01, constructed in 1996, equipped with a torit dust collection system for PM control, exhausting outside, with a maximum throughput capacity of 500 pounds of metal and plastic parts per hour.

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

Emission Limitations and Standards

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 one (1) sandblaster, identified as SB-01, shall not exceed 1.62 pounds per hour, when operating at a process weight rate of 500 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:

$$E = 4.10\ P^{0.67}$$

where

E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour = 0.25 tons per year

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with Condition D.2.1, the torit dust collection system for the particulate matter control shall be in operation and control the particulate matter emissions from the one (1) sandblaster, identified as SB-01, at all times that the sandblaster is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	Complete Finish, Inc.
Address:	200 Parker Dr.
City:	Ashley, Indiana 46705
Phone #:	260-587-3588
MSOP #:	M033-26485-00083

I hereby certify that Complete Finish, Inc. is : ☐ still in operation.
☐ no longer in operation.

I hereby certify that Complete Finish, Inc. is : ☐ in compliance with the requirements of MSOP M033-26485-00083.
☐ not in compliance with the requirements of MSOP M033-26485-00083.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a
Minor Source Operating Permit (MSOP) Renewal

Source Description and Location

Source Name:	**Complete Finish, Inc.**
Source Location:	**200 Parker Dr., Ashley, IN 46705**
County:	**Dekalb**
SIC Code:	**3599**
Permit Renewal No.:	**033-26485-00083**
Permit Reviewer:	**Mehul Sura**

Public Notice Information

On July 1, 2008, the Office of Air Quality (OAQ) had a notice published in the *Auburn Evening Star*, Auburn, Indiana stating that IDEM had received an application from Complete Finish, Inc. located at 200 Parker Dr., Ashley, IN 46705 for a renewal to their MSOP (033-16626-00083) issued on June 9, 2003. The notice also stated that OAQ proposed to issue this renewal and provided information on how the public could review the proposed renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this renewal should be issued as proposed.

Upon further review IDEM, OAQ has made the following changes. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**.

Change 1: On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, the paragraph (b) of 'County Attainment Status' section of the Technical Support Document (TSD) for the proposed MSOP Renewal (033-26485-00083) has been revised.

County Attainment Status

. . .

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

. . .

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	**Complete Finish, Inc.**
Source Location:	**200 Parker Dr., Ashley, IN 46705**
County:	**Dekalb**
SIC Code:	**3599**
Permit Renewal No.:	**033-26485-00083**
Permit Reviewer:	**Mehul Sura**

The Office of Air Quality (OAQ) has reviewed an operating permit renewal application from Complete Finish, Inc. relating to the operation of a metal and plastic parts painting source.

History

On May 2, 2008, Complete Finish, Inc. submitted the application to the OAQ requesting to renew its operating permit. Complete Finish, Inc. was issued MSOP 033-16626-00083 on June 9, 2003.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following emission units and pollution control:

(a) One (1) paint booth, identified as EU-01, constructed in 1996, equipped with air atomization spray applicators and dry filters for particulate control, exhausting to stack SV-01, with a coating capacity of two hundred (200) feet of metal pipe per hour.

(b) One (1) paint booth, identified as EU-02, constructed in 1996, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to stack SV-02, with a coating capacity of ten (10) units of metal and plastic parts per hour.

(c) One (1) paint booth, identified as EU-03, constructed in 2003, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to stack SV-03, with a coating capacity of two thousand five hundred (2,500) metal caps per hour.

(d) One (1) sandblaster, identified as SB-01, constructed in 1996, equipped with a torit dust collection system for PM control, exhausting outside, with a maximum throughput capacity of 500 pounds of metal and plastic parts per hour.

(e) Two (2) natural gas-fired make up air heaters, identified and H-07 and H-08, constructed in 1996, exhausting through stacks HV-07 and HV-08, respectively, each rated at 0.69 million British thermal unit per hour.

(f) One (1) natural gas-fired forced air heater, identified as H-06, constructed in 1996, exhausting through stack HV-06, rated at 0.1 million British thermal unit per hour.

(g) Five (5) natural gas-fired radiant heaters, identified as RH-01 through RH-05, constructed in 1996, exhausting to stacks HV-01 through HV-05, respectively, each rated at 0.15 million British thermal unit per hour.

(h) One (1) natural gas fired drying oven, constructed in 2003, rated at 0.0015 million British thermal unit per hour.

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

There are no emission units and pollution control equipment constructed and operated without a Permit at the source.

Emission Units and Pollution Control Equipment Removed from the Source

No emission units or pollution control equipment have been removed from the source since MSOP No. 033-16626-00083 issued on June 9, 2003.

Existing Approvals

Since the issuance of the MSOP No. 033-16626-00083 on June 9, 2003, the source has not received any new permit approval.

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

Enforcement Issue

IDEM is aware that the source did not submit the permit renewal application before the ninety (90) days of the permit expiration date and therefore, the source has violated the Condition B.5 (Permit Term and Renewal) of the permit. IDEM is reviewing this matter and will take appropriate action.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Dekalb County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

(1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(2) 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. Dekalb 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) Dekalb 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
Dekalb County has been classified as attainment or unclassifiable in Indiana for SO_2, CO, PM10 and NOx. 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 sources under 326 IAC 2-2 or 2-3 and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is still less than 100 tons per year. The source is still not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is still less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is still less than twenty-five (25) tons per year.

(c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward the determination of Part 70 applicability.

Federal Rule Applicability

<u>New Source Performance Standards (NSPS)</u>

(a) **Subpart EE - Standards of Performance for Surface Coating of Metal Furniture**
The source is not subject to the requirements of this NSPS because the source does not coat metal furniture.

(b) **Subpart MM - Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations**
The source is not subject to the requirements of this NSPS because the source does not assemble automobile and light duty trucks.

(c) **Subpart SS - Standards of Performance for Industrial Surface Coating: Large Appliances**

The source is not subject to the requirements of this NSPS because the source does not coat large appliances.

(d) **Subpart TT - Standards of Performance for Metal Coil Surface Coating**
The source is not subject to the requirements of this NSPS because the source does not coat metal coil surface.

(e) **Subpart TTT - Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines**
The source is not subject to the requirements of this NSPS because the source does not coat plastic parts for business machines.

(f) There are no NSPS (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) **Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**
The requirements of this NESHAP apply to an area source of HAPs which is involved in any of the following activities:

(a) Performs paint stripping operation that involves the use of chemical strippers that contain methylene chloride (MeCl) (Chemical Abstract Service number 75092) in paint removal process.

(b) Performs spray coating (containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)) operations for autobody refinishing and mobile equipment.

(c) Performs spray coating (containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)) operations for any part or product made of metal or plastic, or combinations of metal and plastic.

The source does not perform any paint stripping operation which involves the use of chemical strippers containing methylene chloride (MeCl). The source performs metal coating (miscellaneous coating) operations, however the source does not use any coating which contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). Therefore, this NESHAP is not included in the permit for this source.

(b) There are no NESHAP (326 IAC 20 and 40 CFR Part 63) included in the permit for this source, since this source is not a major source of HAPs.

Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential emissions of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source is not subject to the requirements of 326 IAC 1-5-2, because the potential to emit of any pollutant is less than one hundred (100) tons per year.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to the requirements of 326 IAC 1-6-3, because the source is required to have a permit under 326 IAC-2-6.1 (Minor Source Operating Permit (MSOP)).

326 IAC 2-6 (Emission Reporting)

This rule does not apply to the source due to the following reasons:

(a) The source is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program.

(b) The source is not located in Lake or Porter County.

(c) The source does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

326 IAC 5-1 (Opacity Limitations)

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

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

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

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to the requirements of 326 IAC 2-4.1-1, because the potential to emit of any single HAP and combined HAPs are less than 10 and 25 tons per year, respectively.

326 IAC 6-4 (Fugitive Dust Emissions)

This rule applies to any source of fugitive dust emissions.

Pursuant to 326 IAC 6-4-2(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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This rule applies to any source which has potential fugitive particulate emissions (after the effect of any controls) equal to or greater than 25 tons per year. The potential fugitive particulate emissions (after the effect of any controls) from the source (Complete Finish, Inc.) is less than 25 tons per year. Therefore, this source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability - Paint Booths, identified as EU-01, EU-02 and EU-03

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

The manufacturing processes (surface coating operations) at the Paint Booths, identified as EU-01, EU-02 and EU-03, are subject to the requirements of 326 IAC 6-3, because these

manufacturing processes are not listed in 326 IAC 6-3-1(b) and particulate matter emission limits for these manufacturing processes are not established under any other rules.

Pursuant to 326 IAC 6-3-2(d):

(a) The particulate emissions from the Paint Booths, identified as EU-01, EU-02 and EU-03, shall be controlled by the dry particulate filters. These dry particulate filters shall be operated in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the dry particulate filters and do either of the following no later than four (4) hours after such observation:

(A) Repair the dry particulate filters so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The Paint Booths, identified as EU-01, EU-02 and EU-03, are not subject to the requirements of 326 IAC 8-1-6, because each of these paint booths has VOC potential emissions less than twenty-five (25) tons per year.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

The coating operations at the Paint Booths, identified as EU-01, EU-02 and EU-03, do not include passenger cars or passenger car derivatives. Therefore, these coating operations are not subject to the requirements of 326 IAC 8-2-2.

326 IAC 8-2-6 (Metal Furniture Coating Operations)

The coating operations at the Paint Booths, identified as EU-01, EU-02 and EU-03, do not include metal furniture. Therefore, these coating operations are not subject to the requirements of 326 IAC 8-2-6.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The requirements of 326 IAC 8-2-9 apply to any coating facility which meets the following criteria:

(a) is constructed after July 1, 1990; and

(b) has actual VOC emissions (before add-on control) from the coating operations (which involve metal parts or products under the Standard Industrial Classification (SIC) Code of major groups #33, #34, #35, #36, #37, #38, or #39) more than 15 pounds per day.

The Paint Booths, identified as EU-01, EU-02 and EU-03, meet all of the above criteria, therefore these paint booths are subject to the following requirements of 326 IAC 8-2-9.

(a) Pursuant to 326 IAC 8-2-9(d), the Permittee shall not discharge into the atmosphere in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, when coating metal.

Based on the MSDS submitted by the source and VOC emission calculations, the coatings used at these paint booths can comply with this requirement.

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

326 IAC 8-6 Organic Solvent Emissions

The source has VOC potential emissions less than 100 tons per year. Therefore, the Paint Booths, identified as EU-01, EU-02 and EU-03, are not subject to the requirements of 326 IAC 8-6.

State Rule Applicability - Sandblaster, identified as SB-01

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

The manufacturing process (shot blasting process) at the Sandblaster, identified as SB-01, is subject to the requirements of 326 IAC 6-3, because this manufacturing process is not listed in 326 IAC 6-3-1(b), and particulate matter emission limit for this manufacturing process is not established under any other rules.

The process weight rate of the manufacturing process at the Sandblaster, identified as SB-01, is 500 pounds per hour (0.25 ton per hour). Pursuant to 326 IAC 6-3-2(e), the PM emission rate from the Sandblaster, identified as SB-01, shall not exceed 1.62 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:

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

The Sandblaster, identified as SB-01, is equipped with a torit dust collection system for the particulate control. The Sandblaster, identified as SB-01, can comply with the above PM emission limit (1.62 pounds per hour), because the controlled PM emissions from the Sandblaster, identified as SB-01, is 1.27 pounds per hour.

The torit dust collection system shall be in operation at all times the Sandblaster, identified as SB-01, is in operation, in order to comply with 326 IAC 6-3-2.

Compliance Determination Requirements

No compliance determination requirements (except the compliance determination requirement as below), compliance monitoring requirements and testing requirements are included in the permit, because the emissions of all pollutants from each of the emission units at the source are very low.

The compliance determination requirement applicable to the Sandblaster, identified as SB-01, is as follows:

The torit dust collection system shall be in operation and control PM emissions from the Sandblaster, identified as SB-01, at all times the Sandblaster, identified as SB-01, is in operation.

This compliance determination condition is necessary to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application.

An application for the purposes of this review was received on May 2, 2008.

Conclusion

The operation of this metal and plastic parts painting source shall be subject to the conditions of the attached MSOP Renewal No. 033-26485-00083.

IDEM Contact

(a) Questions regarding this proposed MSOP Renewal can be directed to Mehul Sura at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

Appendix A: Emission Calculations
Emissions Summary

Company Name: **Complete Finish, Inc.**
Address City IN Zip: **200 Parker Drive, Ashley, Indiana 46705**
MSOP Renewal No: **033-26485-00083**
Reviewer: **Mehul Sura**
Date: **June 2, 2008**

UNCONTROLLED EMISSIONS IN TONS PER YEAR

	PM	PM10	VOC	NOX	SO2	CO	Single HAP	Combined HAPS
Surface Coating Facilities, including EU-01, EU-02 and EU-03	30.6	30.6	28.8	-	-	-	7.5	12.4
Sandblaster, identified as SB-01	55.5	38.8	-	-	-	-	-	-
Natural Gas Combustion	0.02	0.07	0.05	0.98	0.01	0.82	0.02	0.02
Total	**86.1**	**69.5**	**28.9**	**1.0**	**0.0**	**0.8**	**7.5**	**12.4**

CONTROLLED EMISSIONS IN TONS PER YEAR

	PM	PM10	VOC	NOX	SO2	CO	Single HAP	Combined HAPS
Surface Coating Facilities, including EU-01, EU-02 and EU-03	1.5	1.5	28.8	-	-	-	7.5	12.4
Sandblaster, identified as SB-01	5.5	3.9	-	-	-	-	-	-
Natural Gas Combustion	0.02	0.07	0.05	0.98	0.01	0.82	0.02	0.02
Total	**7.1**	**5.5**	**28.9**	**1.0**	**0.0**	**0.8**	**7.5**	**12.4**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Complete Finish, Inc.
Address City IN Zip: 200 Parker Drive, Ashley, Indiana 46705
MSOP Renewal No: 033-26485-00083
Reviewer: Mehul Sura
Date: June 2, 2008

Coating Facility	Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	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 (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
EU-01	Dupont Enamel Paint 525-333	12.34	27.2%	0.00%	27.2%	0.00%	72.7%	0.00380	200	3.36	3.36	2.55	61.2	11.2	15.0	4.62	50.0%
	Porter Primer 299	16.505	20.0%	0.00%	20.0%	0.00%	80.0%	0.00380	200	3.30	3.30	2.51	60.2	11.0	22.0	4.13	50.0%
	Clean-up Solvent 4-PLT	7.01	100%	0.00%	100%	0.00%	0.00%	0.0002	200	7.01	7.01	0.280	6.73	1.23	0.00	N/A	50.0%
EU-02	Porter Enamel Paint 2549	9.50	36.7%	0.00%	36.7%	0.00%	63.0%	0.0530	10.0	3.49	3.49	1.85	44.3	8.09	3.49	5.53	75.0%
	Porter Primer 9505	11.3	31.0%	0.00%	31.0%	0.00%	47.0%	0.0530	10.0	3.50	3.50	1.86	44.6	8.13	4.52	7.45	75.0%
	Clean-up Solvent 4-PLT	7.01	100%	0.00%	100%	0.00%	0.00%	0.0002	10.0	7.01	7.01	0.0140	0.336	0.0614	0.00	N/A	75.0%
EU-03	Porter Enamel Paint 2549	9.50	36.7%	0.00%	36.7%	0.00%	63.0%	0.000250	2500	3.49	3.49	**2.18**	**52.3**	**9.54**	**4.12**	**5.53**	75.0%
										PM Control Efficiency	95.00%						
Potential to Emit				**Add worst case coating to all solvents**						**Uncontrolled**		**6.59**	**158.08**	**28.85**	**30.62**		
										Controlled		**6.59**	**158**	**28.8**	**1.53**		

METHODOLOGY

PM control devices are dry filters.

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

Appendix A: Emission Calculations
HAPs Emission Calculations

Company Name: **Complete Finish, Inc.**
Address City IN Zip: **200 Parker Drive, Ashley, Indiana 46705**
MSOP Renewal No: **033-26485-00083**
Reviewer: **Mehul Sura**
Date: **June 2, 2008**

Coating Facility	Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methanol	Weight % Ethyl Benzene	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Methanol Emissions (tons/yr)
EU-01	Dupont Enamel Paint 525-333	12.34	0.00380	200	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00
	Porter Primer 299	16.51	0.00380	200	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00
	Clean-up Solvent 4-PLT	7.01	0.0002	200	5.59%	66.28%	9.38%	0.00%	0.0687	0.814	0.115
EU-02	Porter Enamel Paint 2549	9.50	0.0530	10.0	10.0%	0.00%	0.00%	0.00%	2.21	0.00	0.00
	Porter Primer 9505	11.3	0.0530	10.0	10.0%	0.00%	0.00%	0.00%	2.62	0.00	0.00
	Clean-up Solvent 4-PLT	7.01	0.0002	10.0	5.59%	66.28%	9.38%	0.00%	0.00	0.0407	0.00576
EU-03	Porter Enamel Paint 2549	9.50	0.000250	2500	10.00%	5.00%	0.00%	10.00%	2.60	1.30	0.00
							Worst Case Single HAP		**7.50**	**2.16**	**0.121**
										Worst Case Total HAPs	

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Abrasive Blasting - Confined
Company Name: Complete Finish, Inc.
Address City IN Zip: 200 Parker Drive, Ashley, Indiana 46705
MSOP Renewal No: 033-26485-00083
Reviewer: Mehul Sura
Date: June 2, 2008

Table 1 - Emission Factors for Abrasives

	Emission Factor	
Abrasive	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	-

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

	Nozzle Pressure (psig)							
Internal diameter, in	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =	309	
D = Density of abrasive (lb/ft3) From Table 2 =	99.0	
D1 = Density of sand (lb/ft3) =	99.0	
ID = Actual nozzle internal diameter (in) =	0.250	
ID1 = Nozzle internal diameter (in) from Table 3 =	0.250	
Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)	**309**	per nozzle
EF = emission factor (lb PM/ lb abrasive) From Table 1 =	0.0410	
FR = Flow Rate (lb/hr) =	309	
w = fraction of time of wet blasting =	0.00	%
N = number of nozzles =	1.00	
Dust Collector Control Efficiency for PM=	90	%
Dust Collector Control Efficiency for PM10=	90	%

Uncontrolled PM Emissions =	**12.7**	**lb/hr**
	55.5	**ton/yr**

Controlled PM Emissions =	**1.3**	**lb/hr**
	5.5	**ton/yr**

Uncontrolled PM10 Emissions =	**8.9**	**lb/hr**
	38.8	**ton/yr**

Controlled PM10 Emissions =	**0.9**	**lb/hr**
	3.9	**ton/yr**

METHODOLOGY

PM and PM10 control device is torit dust collection system.
Sand shot material is used for the shot blasting purpose.
Abrasive flow rate is provided by the source.
Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
Uncontrolled PM Emissions (lb/hr) = Emission Factor (lb PM / lb abrasive) x Abrasive Flow Rate (lb/hr-nozzle) x Number of Nozzle
Uncontrolled PM Emissions (tons/year) =Uncontrolled PM Emissions (lb/hr) x 8760 (hrs/year) x 2000 (lbs/ton)
Uncontrolled PM10 Emissions (lb/hr) = Uncontrolled PM Emissions (lb/hr) x 0.86 (lb PM10 / lb PM)
Uncontrolled PM10 Emissions (tons/year) =Uncontrolled PM10 Emissions (lb/hr) x 8760 (hrs/year) x 2000 (lbs/ton)
Controlled PM/PM10 emissions (tons/year) = Uncontrolled PM10 Emissions (tons/year) x (1-Control Efficiency of Dust Collection System)

Natural Gas Combustion

Company Name: **Complete Finish, Inc.**
Address City IN Zip: **200 Parker Drive, Ashley, Indiana 46705**
MSOP Renewal No: **033-26485-00083**
Reviewer: **Mehul Sura**
Date: **June 2, 2008**

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Five (5) radiant heaters, each rated at 0.15 MMBtu/hr	0.75	6.6
One (1) forced air heater rated at 0.1 MMBtu/hr.	0.1	0.9
Two (2) make up air heaters, each rated at 0.69 MMBtu/hr	1.38	12.1
One (1) drying oven, rated at 0.015 MMBtu/hr	0.0015	0.013
Total	2.23	19.55

Criteria Pollutant

	PM*	PM10*	SO2	Nox**	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100	5.50	84.0
Potential Emission in tons/yr	0.0186	0.0743	0.00586	0.977	0.0538	0.821

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.05E-05	1.17E-05	7.33E-04	1.76E-02	3.32E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	4.89E-06	1.08E-05	1.37E-05	3.71E-06	2.05E-05	0.0184

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.