



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: March 23, 2009  
RE: J. M. Hutton Co. Inc. / 177-26604-00083  
FROM: Matthew Stuckey, Deputy 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.



# 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  
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## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**J.M. Hutton & Co., Inc.**  
**1501 S. 8<sup>th</sup> St. and 1117 N. E St.**  
**Richmond, Indiana 47375**

(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.: T 177-26604-00083	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 23, 2009  Expiration Date: March 23, 2014

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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)]

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The Permittee owns and operates a stationary Burial Casket Manufacturing and Surface Coating Operation.

Source Address:	1501 S. 8 <sup>th</sup> Street, and 1117 N. E Street; Richmond, IN 47375
Mailing Address:	P.O. Box 129, Richmond, IN 47375
General Source Phone Number:	765-962-3591
SIC Code:	3995
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This burial casket constructing company and surface coating operation consists of two (2) plants:

- (a) Plant 1 is located at 1501 South 8<sup>th</sup> Street, Richmond, Indiana 47375; and
- (b) Plant 2 is located at 1117 North E Street, Richmond, Indiana 47375.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of Part 70 permit T177-6466-00083, issued on September 25, 1998.

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

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

- (a) Plant 1:
  - (1) One (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:
    - (A) Six (6) surface coating booths, identified as S1, S2, S3, S4, S5, and S9, each utilizing a High Volume Low Pressure (HVLV) or equivalent application with dry filters or equivalent for particulate control, and exhausting through stacks S001, S002, S003, S004, S005, and S009, respectively;
    - (B) One (1) surface coating booth, identified as S6, utilizing an electrostatic airless spray gun, with dry filters or equivalent for particulate control, and exhausting to stack S006.

Under NESHAP MMMM S1, S2, S3, S4, S5, S9 and S6 are considered existing affected sources because the construction of the source commenced prior to August 13, 2002 and the source is not reconstructed.

(b) Plant 2:

- (1) One (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of four (4) surface coating booths, constructed in 1994, identified as E1, E2, E3, and E4, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters for particulate control, and exhausting to stacks E001, E002, E003, and E004, respectively.

Under NESHAP MMMM E1, E2, E3 and E4 are considered existing affected sources because the construction of the source commenced prior to August 13, 2002 and the source is not reconstructed.

- (2) One (1) wooden casket surface coating line, constructed in 1979, with a maximum capacity of coating two (2) caskets per hour, consisting of three (3) surface coating booths identified as E7, E8, and E9, utilizing High Volume Low Pressure (HVLP) or equivalent application for E7 and E8, and manual hand-wipe application for E9, exhausting to stacks E007, E008, and E009, respectively; and
- (3) One (1) spray coating booth, identified as E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stack E006.

Under NESHAP MMMM E6 is considered existing affected sources because the construction of the source commenced prior to August 13, 2002 and the source is not reconstructed.

- (4) One (1) 5.02 MMBtu/hr steam-generating wood-fired boiler, installed in 1973, located at Plant 2. [326 IAC 6-2-3]

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

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

- (a) One (1) 6.0 MMBtu/hr natural gas boiler, installed in 1994, located at Plant 1. [326 IAC 6-2-4]
- (b) One (1) 6.0 MMBtu/hr natural gas boiler, installed after 1998, located at Plant 2. [326 IAC 6-2-4]
- (c) One (1) woodworking operation located at Plant 2, with emissions controlled by two (2) cyclones. [326 IAC 6-3-2]
- (d) One (1) powder coating booth, approved for construction in 2008, for coating of stamped metal parts, equipped with manual electrostatic spray equipment, with a maximum coating rate of 38.4 pounds per hour, with powder overspray collected by one (1) cartridge style batch powder collector for reuse, which has been determined to be integral to the process. The emissions from this unit are less than the exemption levels specified in 326 IAC 2-1.1-3(e)(1).

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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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]

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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 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)]

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- (a) This permit, T 177-26604-00083, 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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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 [326 IAC 2-7-7] [IC 13-17-12]

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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 [326 IAC 2-7-5(5)]

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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 [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

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- (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.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (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. All 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.10 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]**

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- (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 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.11 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, 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

- (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.12 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.13** 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 T 177-26604-00083 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 permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14** 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.15 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.16 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.17 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.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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

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- (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.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (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.21 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.22 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.23 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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]**

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- (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.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]**

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- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

**B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]**

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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 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 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.7 Performance Testing [326 IAC 3-6]**

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- (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 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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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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.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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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 or ninety (90) days of initial start-up, whichever is later. 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.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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

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- (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.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on.
- (b) 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

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- (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.15 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]**

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- (a) Pursuant to 326 IAC ~~2-6-3(a)(1)~~ **2-6-3(b)(2), starting in 2005, and every three (3) years thereafter**, the Permittee shall submit by July 1 of ~~each year~~, 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.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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- (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 or ninety (90) days of initial start-up, whichever is later.

**C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (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) 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Plant 1:
- (1) One (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:
    - (A) Six (6) surface coating booths, identified as S1, S2, S3, S4, S5, and S9, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting through stacks S001, S002, S003, S004, S005, and S009, respectively;
    - (B) One (1) surface coating booth, identified as S6, utilizing an electrostatic airless spray gun, with dry filters or equivalent for particulate control, and exhausting to stack S006.
- (b) Plant 2:
- (1) One (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of four (4) surface coating booths, constructed in 1994, identified as E1, E2, E3, and E4, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters for particulate control, and exhausting to stacks E001, E002, E003, and E004, respectively;
  - (2) One (1) wooden casket surface coating line, constructed in 1979, with a maximum capacity of coating two (2) caskets per hour, consisting of the following:
    - (A) Two (2) surface coating booths, identified as E7 and E8, utilizing High Volume Low Pressure (HVLP) or equivalent application, and exhausting to stacks E007 and E008, respectively; and
    - (B) One (1) surface coating booth, identified as E9, utilizing manual hand-wipe application, and exhausting to stack E009.
  - (3) One (1) spray coating booth, identified as E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stack E006.

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

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

#### D.1.1 PSD Minor Limit [326 IAC 2-2]

The use of VOC, including coatings, dilution solvents, and cleaning solvents at all surface coating booths (S1, S2, S3, S4, S5, S6, S9, E1, E2, E3, E4, E6, E7, E8, and E9) shall be less than two hundred forty-five (245) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with the above usage limit, combined with the potential to emit VOC from other emission units at the source, shall limit the potential to emit of VOC to less than two hundred fifty (250) tons per twelve (12) consecutive month period and render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the entire source.

#### D.1.2 Volatile Organic Compounds (VOC) BACT [326 IAC 8-1-6]

- (a) Pursuant to CP-177-3462-00054, issued September 27, 1994, and 326 IAC 8-1-6 (New

Facilities; General Reduction Requirements), the VOC emission from the metal casket surface coating line, located at Plant 1, consisting of seven (7) surface coating booths, identified as S1, S2, S3, S4, S5, S6, and S9, shall utilize Best Available Control Technology (BACT) as follows:

- (1) Utilize High Volume Low Pressure (HVLP) or equivalent spray guns and one (1) electrostatic airless spray gun with a minimum transfer efficiency of 65% for each spray gun.
  - (2) High Volume Low Pressure (HVLP) or equivalent spray guns and/or the electrostatic airless spray gun shall be used at all times that the coating line is operated.
- (b) Pursuant to CP-177-3461-00053, issued October 25, 1994, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the metal casket surface coating line, located at Plant 2, consisting of four (4) surface coating booths, identified as E1, E2, E3, and E4, shall utilize Best Available Control Technology (BACT) as follows:
- (1) Utilize High Volume Low Pressure (HVLP) or equivalent application equipment at all times that the booths are in operation, with the exception of shading operations.  
  
(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.)
  - (2) Air atomization equipment may be used for shading operations (shading involves the application of a narrow line of coating on the casket).
  - (3) Water base primer shall be used for all primer applications due to the significantly reduced concentrations of VOC.

**D.1.3 Volatile Organic Compounds (VOC) Minor Limit [326 IAC 8-1-6]**

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The VOC usage to the surface coating booth, identified as E6, located at Plant 2, shall be less than twenty-five (25.0) tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month. Compliance with the above limit, shall render 326 IAC 8-1-6 not applicable to surface coating booth, E6.

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

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Pursuant to 326 IAC 6-3-2(d), PM from the surface coating shall be controlled by dry particulate filters, or equivalent, 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)]**

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

**Compliance Determination Requirements**

**D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 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

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

#### D.1.7 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters or equivalent control device. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks; S001, S002, S003, S004, S005, S006, S009, E001, E002, E003, E004, E005, E006, E007, E008, and E009 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 stacks; S001, S002, S003, S004, S005, S006, S009, E001, E002, E003, E004, E005, E006, E007, E008, and E009, 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.1.8 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used, including cleanup solvent.
  - (2) The amount of coating material and solvent, including cleanup 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 usage for each month.
- (b) To document compliance with Condition D.1.2(b)(3), the Permittee shall maintain records of MSDS or other manufacturers specifications for the type of primer used during application to ensure the usage of a water based primer.
- (c) To document compliance with Condition D.1.7 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description

- (a) One (1) 5.02 MMBtu/hr steam-generating wood-fired boiler, installed in 1973, located at Plant 2.

#### [326 IAC 2-7-5(15)]: Insignificant Activities

- (b) One (1) 6.0 MMBtu/hr natural gas boiler, installed in 1994, located at Plant 1.  
(c) One (1) 6.0 MMBtu/hr natural gas boiler, installed after 1998, located at Plant 2.

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

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

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

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the 5.02 MMBtu per hour heat input, steam-generating wood-fired boiler, installed in 1973, shall be limited to 0.6 pounds per MMBtu heat input.

#### D.2.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating);

- (a) The PM from the 6.0 MMBtu/hr natural gas boiler, installed in 1994, located at Plant 1, shall be limited to 0.58 pounds per MMBtu heat input.  
(b) The PM from the 6.0 MMBtu/hr natural gas boiler, installed after 1998, located at Plant 2, shall be limited to 0.52 pounds per MMBtu heat input.

These limitations are based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (c) One (1) woodworking operation located at Plant 2, with emissions controlled by two (2) cyclones.

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

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

#### D.3.1 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 woodworking operation shall not exceed 2.1 pounds per hour when operating at a process weight rate of 756 pounds per hour.

The pound per hour limitation is based on the following:

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.3.2 Operation of Cyclone

The cyclone shall operate at all the times that the woodwoking equipment is operating.

#### D.3.3 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 the woodworking operation and the two (2) cyclones.

## SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-7-5(15)]: Exempt Activities

- (d) One (1) powder coating booth, approved for construction in 2008, for coating of stamped metal parts, equipped with manual electrostatic spray equipment, with a maximum coating rate of 38.4 pounds per hour, with powder overspray collected by one (1) cartridge style batch powder collector for reuse, which has been determined to be integral to the process. The emissions from this unit are less than the exemption levels specified in 326 IAC 2-1.1-3(e)(1).

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

### Compliance Determination Requirements

#### D.4.1 Particulate Emissions

The cartridge style batch powder collector is considered an integral part of the powder coating booth; therefore, particulate from the powder coating booth shall be controlled by the cartridge style batch powder collector at all times that the powder coating booth is in operation, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

## SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-7-5(15)]:

- (a) Plant 1:
- (1) One (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:
    - (A) Six (6) surface coating booths, identified as S1, S2, S3, S4, S5, and S9, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting through stacks S001, S002, S003, S004, S005, and S009, respectively;
    - (B) One (1) surface coating booth, identified as S6, utilizing an electrostatic airless spray gun, with dry filters or equivalent for particulate control, and exhausting to stack S006.
- (b) Plant 2:
- (1) One (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of four (4) surface coating booths, constructed in 1994, identified as E1, E2, E3, and E4, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters for particulate control, and exhausting to stacks E001, E002, E003, and E004, respectively.
  - (2) One (1) spray coating booth, identified as E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stack E006.
- (c) One (1) powder coating booth, approved for construction in 2008, for coating of stamped metal parts, equipped with manual electrostatic spray equipment, with a maximum coating rate of 38.4 pounds per hour, with powder overspray collected by one (1) cartridge style batch powder collector for reuse, which has been determined to be integral to the process. The emissions from this unit are less than the exemption levels specified in 326 IAC 2-1.1-3(e)(1).

Under NESHAP MMMM, S1, S2, S3, S4, S5, S9, S6, E1, E2, E3, E4, E6, and the powder coating booth are considered existing affected sources because the construction of the source commenced prior to August 13, 2002 and the source is not reconstructed.

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

### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

#### E.1.1 General Provisions Relating to NESHAP Subpart MMMM [40 CFR Part 63, Subpart MMMM]

Pursuant to 40 CFR 63.3901, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 2 of 40 CFR Part 63, Subpart MMMM in accordance with schedule in 40 CFR 63 Subpart MMMM.

**E.1.2 NESHAP Subpart MMMM Requirements [40 CFR Part 63, Subpart MMMM]**

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Pursuant to CFR Part 63, Subpart MMMM, the Permittee shall comply with the provisions of 40 CFR Part 63.3880, which are incorporated by reference as 326 IAC 20-80 for the surface coating operations S1, S2, S3, S4, S5, S9, S6, E1, E2, E3, E4, E6. The following applicable portions of 40 CFR Part 63, Subpart M, are included as Attachment A to this permit:

- (1) 40 CFR 63.3881 (a)(1), (a)(2), and (b);
- (2) 40 CFR 63.3882;
- (3) 40 CFR 63.3883 (b);
- (4) 40 CFR 63.3890 (b)(1);
- (5) 40 CFR 63.3891 (a) and (b);
- (6) 40 CFR 63.3892 (a);
- (7) 40 CFR 63.3893 (a);
- (8) 40 CFR 63.3900 (a)(1) and (b);
- (9) 40 CFR 63.3901;
- (10) 40 CFR 63.3910, except 40 CFR 63.3910 (c)(8)(iii), (9), (10) and (11);
- (11) 40 CFR 63.3920, except 40 CFR 63.3920 (a)(7), (b) and (c);
- (12) 40 CFR 63.3930, except 40 CFR 63.3930 (c)(4) and (k);
- (13) 40 CFR 63.3931;
- (14) 40 CFR 63.3940;
- (15) 40 CFR 63.3941;
- (16) 40 CFR 63.3942;
- (17) 40 CFR 63.3950;
- (18) 40 CFR 63.3951;
- (19) 40 CFR 63.3952;
- (20) 40 CFR 63.3980; and
- (21) 40 CFR 63.3981.
- (22) Table 2 -- Applicability of General Provisions to Subpart MMMM of Part 63
- (23) Table 3 -- Default Organic HAP Mass Fraction for Solvents and Solvent Blends
- (24) Table 4 -- Default Organic HAP Mass Fraction for Petroleum Solvent Groups

**E.1.3 NESHAP Subpart MMMM – Completed Notifications and Reports**

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Pursuant to 40 CFR Part 63, Subpart MMMM, the Permittee has submitted the following one time notification:

- (1) Initial Notification submitted on November 30, 2004
- (2) Application submitted on April 3, 2006
- (3) Notification of Compliance Status submitted on February 29, 2008

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: J.M.Hutton & Co., Inc.  
Source Address: 1117 N. E Street, Richmond, Indiana 47375  
Mailing Address: P.O. Box 129, Richmond, 47375  
Part 70 Permit No.: T 177-26604-00083

**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.M.Hutton & Co., Inc.  
Source Address: 1117 N. E Street, Richmond, Indiana 47375  
Mailing Address: P.O. Box 129, Richmond, 47375  
Part 70 Permit No.: T 177-26604-00083

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: J.M.Hutton & Co., Inc.  
 Source Address: 1117 N. E Street, Richmond, Indiana 47375  
 Mailing Address: P.O. Box 129, Richmond, 47375  
 Part 70 Permit No.: T 177-26604-00083

MONTHS: \_\_\_\_\_ to \_\_\_\_\_ YEAR: \_\_\_\_\_

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. 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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

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. M. Hutton and Company, Inc.  
Source Address: 1501 S. 8<sup>th</sup> St. and 1117 N. E St. Richmond, IN 47375  
Mailing Address: P.O. Box 129, Richmond, IN 47375  
Part 70 Permit No.: T177-26604-00083  
Facility: All surface coating booths (S1, S2, S3, S4, S5, S6, S9, E1, E2, E3, E4, E6, E7, E8, and E9)  
Parameter: VOC Usage, including: coatings, dilution solvents, and cleaning solvents  
Limit: Less than 245 tons per consecutive 12 month period

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

- 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. M. Hutton and Company, Inc.  
Source Address: 1501 S. 8<sup>th</sup> St. and 1117 N. E St. Richmond, IN 47375  
Mailing Address: P.O. Box 129, Richmond, IN 47375  
Part 70 Permit No.: T177-26604-00083  
Facility: E6, located at Plant 2  
Parameter: VOC Usage, including: coatings, dilution solvents, and cleaning solvents  
Limit: Less than 25.0 tons per consecutive 12 month period

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

- 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.

**ATTACHMENT A – Applicable Portions of the National Emission Standards for  
Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and  
Products  
[40 CFR Part 63, Subpart M] [326 IAC 20-80]**

<b>Source Description and Location</b>
--

Source Name:	J.M. Hutton & Co., Inc.
Source Location (1):	1501 S. 8th Street, Richmond, IN 47375
Source Location (2):	1117 N. E Street, Richmond, IN 47375
County:	Wayne
SIC Code:	3995
Permit Renewal No.:	177-26604-00083
Permit Reviewer:	James Mackenzie

<b>NESHAP [40 CFR Part 63, Subpart M]</b>
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**§ 63.3881 Am I subject to this subpart?**

(a) Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and numerous other industrial, household, and consumer products. Except as provided in paragraph (c) of this section, the source category to which this subpart applies is the surface coating of any miscellaneous metal parts or products, as described in paragraph (a)(1) of this section, and it includes the subcategories listed in paragraphs (a)(2) through (6) of this section.

(1) Surface coating is the application of coating to a substrate using, for example, spray guns or dip tanks. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. However, these activities do not comprise surface coating if they are not directly related to the application of the coating. Coating application with handheld, non-refillable aerosol containers, touch-up markers, marking pens, or the application of paper film or plastic film which may be pre-coated with an adhesive by the manufacturer are not coating operations for the purposes of this subpart.

(2) The general use coating subcategory includes all surface coating operations that are not high performance, magnet wire, rubber-to-metal, or extreme performance fluoropolymer coating operations.

(3) The high performance coating subcategory includes surface coating operations that are performed using coatings that meet the definition of high performance architectural coating or high temperature coating in § 63.3981.

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in § 63.3882, that uses 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. You do not need to include coatings that meet the definition of non- HAP coating contained in § 63.3981 in determining whether you use 946 liters

(250 gal) per year, or more, of coatings in the surface coating of miscellaneous metal parts and products.

(c) This subpart does not apply to surface coating or a coating operation that meets any of the criteria of paragraphs (c)(1) through (17) of this section.

(2) Surface coating operations that occur at research or laboratory facilities, or is part of janitorial, building, and facility maintenance operations, or that occur at hobby shops that are operated for noncommercial purposes.

#### **§ 63.3882 What parts of my plant does this subpart cover?**

(a) This subpart applies to each new, reconstructed, and existing affected source within each of the four subcategories listed in § 63.3881(a).

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (4) of this section that are used for surface coating of miscellaneous metal parts and products within each subcategory.

(1) All coating operations as defined in § 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/ or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(c) An affected source is a new affected source if you commenced its construction after August 13, 2002 and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed.

(d) An affected source is reconstructed if it meets the criteria as defined in § 63.2.

(e) An affected source is existing if it is not new or reconstructed.

#### **§ 63.3883 When do I have to comply with this subpart?**

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) through (c) of this section. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§63.3940, 63.3950, and 63.3960.

(b) For an existing affected source, the compliance date is the date 3 years after January 2, 2004.

#### **Emission Limitations**

##### **§ 63.3890 What emission limits must I meet?**

(b) For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in paragraphs (b)(1) through (5) of this section, except as specified in paragraph (c) of this section, determined according to the requirements in §63.3941, §63.3951, or §63.3961.

(1) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

**§ 63.3891 What are my options for meeting the emission limits?**

You must include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.3890. To make this determination, you must use at least one of the three compliance options listed in paragraphs (a) through (c) of this section. You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by §63.3930(c), and you must report it in the next semiannual compliance report required in §63.3920.

(a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. You must meet all the requirements of §§63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option.

(b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

**§ 63.3892 What operating limits must I meet?**

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any operating limits.

**§ 63.3893 What work practice standards must I meet?**

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any work practice standards.

**General Compliance Requirements**

**§ 63.3900 What are my general requirements for complying with this subpart?**

(a) You must be in compliance with the emission limitations in this subpart as specified in paragraphs (a)(1) of this section.

(1) Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, as specified in §63.3891(a) and (b), must be in compliance with the applicable emission limit in §63.3890 at all times.

(b) You must always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this subpart, according to the provisions in §63.6(e)(1)(i).

**§ 63.3901 What parts of the General Provisions apply to me?**

Table 2 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

**Notifications, Reports, and Records**

**§ 63.3910 What notifications must I submit?**

(a) General. You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. You must submit the initial notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after January 2, 2004, whichever is later. The Permittee submitted the initial notification to IDEM, OAQ on December 31, 2004. If you are using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) as provided for under §63.3881(d) to constitute compliance with this subpart for any or all of your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. If you are complying with another NESHAP that constitutes the predominant activity at your facility under §63.3881(e)(2) to constitute compliance with this subpart for your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.

(c) Notification of compliance status. You must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source. The notification of compliance status must contain the information specified in paragraphs (c)(1) through (11) of this section and in §63.9(h).

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source.

(4) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation in the affected source during the initial compliance period.

(5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.

(6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.

(i) A description and statement of the cause of the deviation.

(ii) If you failed to meet the applicable emission limit in §63.3890, include all the calculations you used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports.

(7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.3941(a), (b), or (c). You do not need to submit copies of any test reports.

(i) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.

(ii) Volume fraction of coating solids for one coating.

(iii) Density for one coating, one thinner and/or other additive, and one cleaning material, except that if you use the compliant material option, only the example coating density is required.

(iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.3951.

(8) The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section.

(i) For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 2 of §63.3941.

(ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.3951.

#### **§ 63.3920 What reports must I submit?**

(a) Semiannual compliance reports. You must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.

(1) Dates. Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.3940, §63.3950, or §63.3960 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

(2) Inclusion with title V report. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) General requirements. The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.

(v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.3891(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(vi) If you used the predominant activity alternative (§63.3890(c)(1)), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report.

(vii) If you used the facility-specific emission limit alternative (§63.3890(c)(2)), include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period.

(4) No deviations. If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

(5) Deviations: Compliant material option. If you used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(5)(i) through (iv) of this section.

(i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.

(ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).

(iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).

(iv) A statement of the cause of each deviation.

(6) Deviations: Emission rate without add-on controls option. If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890.

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

### **§ 63.3930 What records must I keep?**

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. If you are using the predominant activity alternative under §63.3890(c), you must keep records of the data and calculations used to determine the predominant activity. If you are using the facility-specific emission limit alternative under §63.3890(c), you must keep records of the data used to calculate the facility-specific

emission limit for the initial compliance demonstration. You must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.

(2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941.

(3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951.

(d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used.

(e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.

(f) A record of the volume fraction of coating solids for each coating used during each compliance period.

(g) If you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(h) If you use an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), you must keep records of the information specified in paragraphs (h)(1) through (3) of this section.

(1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

(2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.3951.

(3) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

(j) You must keep records of the date, time, and duration of each deviation.

**§ 63.3931 *In what form and for how long must I keep my records?***

(a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years.

***Compliance Requirements for the Compliant Material Option***

**§ 63.3940 *By what date must I conduct the initial compliance demonstration?***

You must complete the initial compliance demonstration for the initial compliance period according to the requirements in §63.3941. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to §63.3941 and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the applicable emission limit in §63.3890, and that you used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to §63.3941(a).

**§ 63.3941 *How do I demonstrate initial compliance with the emission limitations?***

You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in §63.3890 and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. Any

coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in §§63.3892 and 63.3893, respectively. You must meet all the requirements of this section. Use the procedures in this section on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.

(a) Determine the mass fraction of organic HAP for each material used. You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.

(1) *Method 311 (appendix A to 40 CFR part 63)*. You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test.

(i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791).

(ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).

(2) *Method 24 (appendix A to 40 CFR part 60)*. For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in appendix A to subpart PPPP of this part, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to subpart PPPP of this part, as a substitute for the mass fraction of organic HAP.

(3) *Alternative method*. You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(4) *Information from the supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(5) *Solvent blends.* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to this subpart. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) *Determine the volume fraction of coating solids for each coating.* You must determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (b)(1) through (4) of this section. If test results obtained according to paragraph (b)(1) of this section do not agree with the information obtained under paragraph (b)(3) or (4) of this section, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(1) *ASTM Method D2697–86 (Reapproved 1998) or ASTM Method D6093–97 (Reapproved 2003).* You may use ASTM Method D2697–86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings" (incorporated by reference, see §63.14), or ASTM Method D6093–97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.

(2) *Alternative method.* You may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(3) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(4) *Calculation of volume fraction of coating solids.* You may determine the volume fraction of coating solids using Equation 1 of this section:

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Eq. 1})$$

Where:

$V_s$  = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{\text{volatiles}}$  = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

$D_{\text{avg}}$  = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 test results and other information sources, the test results will take precedence unless,

after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(c) *Determine the density of each coating.* Determine the density of each coating used during the compliance period from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475–98 test results and the supplier’s or manufacturer’s information, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(d) *Determine the organic HAP content of each coating.* Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 of this section:

$$H_c = \frac{(D_c)(W_c)}{V_s} \quad (\text{Eq. 2})$$

Where:

$H_c$  = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

$D_c$  = Density of coating, kg coating per liter (gal) coating, determined according to paragraph (c) of this section.

$W_c$  = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to paragraph (a) of this section.

$V_s$  = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to paragraph (b) of this section.

(e) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in §63.3890; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to paragraph (a) of this section. You must keep all records required by §§63.3930 and 63.3931. As part of the notification of compliance status required in §63.3910, you must identify the coating operation(s) for which you used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in paragraph (a) of this section.

#### **§ 63.3942 How do I demonstrate continuous compliance with the emission limitations?**

(a) For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months.

(b) If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(5).

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the compliant material option. If there were no deviations from the applicable emission limit in §63.3890, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941(a).

(d) You must maintain records as specified in §§63.3930 and 63.3931.

### ***Compliance Requirements for the Emission Rate Without Add-On Controls Option***

#### ***§ 63.3950 By what date must I conduct the initial compliance demonstration?***

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3951. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.3951 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890.

#### ***§ 63.3951 How do I demonstrate initial compliance with the emission limitations?***

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.3890, but is not required to meet the operating limits or work practice standards in §§63.3892 and 63.3893, respectively. You must conduct a separate initial compliance demonstration for each general use, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(a) Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.3941(a).

(b) Determine the volume fraction of coating solids. Determine the volume fraction of coating solids (liter (gal) of coating solids per liter (gal) of coating) for each coating used during each month according to the requirements in §63.3941(b).

(c) Determine the density of each material. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965–02, “Standard Test Methods for Specific Gravity of Coating Powders” (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475–98 or ASTM Method D5965–02 test results and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(d) Determine the volume of each material used. Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of this section.

(e) Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

$$H_e = A + B + C - R_w \quad (\text{Eq. 1})$$

Where:

$H_e$  = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

$R_w$  = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDf for treatment or disposal during the month, kg, determined according to paragraph (e)(4) of this section. (You may assign a value of zero to  $R_w$  if you do not wish to use this allowance.)

(1) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

$$A = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(W_{c,i}) \quad (\text{Eq. 1A})$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

Vol<sub>c,i</sub> = Total volume of coating, i, used during the month, liters.

D<sub>c,i</sub> = Density of coating, i, kg coating per liter coating.

W<sub>c,i</sub> = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

m = Number of different coatings used during the month.

(2) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^n (Vol_{t,j}) (D_{t,j}) (W_{t,j}) \quad (Eq. 1B)$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

Vol<sub>t,j</sub> = Total volume of thinner and/or other additive, j, used during the month, liters.

D<sub>t,j</sub> = Density of thinner and/or other additive, j, kg per liter.

W<sub>t,j</sub> = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

n = Number of different thinners and/or other additives used during the month.

(3) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C = \sum_{k=1}^p (Vol_{s,k}) (D_{s,k}) (W_{s,k}) \quad (Eq. 1C)$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

Vol<sub>s,k</sub> = Total volume of cleaning material, k, used during the month, liters.

D<sub>s,k</sub> = Density of cleaning material, k, kg per liter.

W<sub>s,k</sub> = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

(4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine the mass according to paragraphs (e)(4)(i) through (iv) of this section.

(i) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.

(iv) You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) Calculate the total volume of coating solids used. Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i=1}^m (Vol_{c,i}) (V_{s,i}) \quad (Eq. 2)$$

Where:

$V_{st}$  = Total volume of coating solids used during the month, liters.

$Vol_{c,i}$  = Total volume of coating, i, used during the month, liters.

$V_{s,i}$  = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.3941(b).

m = Number of coatings used during the month.

(g) Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad (Eq. 3)$$

Where:

$H_{yr}$  = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

$H_e$  = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of this section.

$V_{st}$  = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of this section.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(h) Compliance demonstration. The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section must be less than or equal to the applicable emission limit for each subcategory in §63.3890 or the predominant activity or facility-specific emission limit allowed in §63.3890(c). You must keep all records as required by §§63.3930 and 63.3931. As part of the notification of compliance status required by §63.3910, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890, determined according to the procedures in this section.

### **§ 63.3952 How do I demonstrate continuous compliance with the emission limitations?**

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), must be less than or equal to the

applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under §63.3890(c), you must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(6).

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, determined according to §63.3951(a) through (g).

(d) You must maintain records as specified in §§63.3930 and 63.3931.

#### ***Other Requirements and Information***

#### ***§ 63.3980 Who implements and enforces this subpart?***

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the requirements in §63.3881 through 3883 and §63.3890 through 3893.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major alternatives to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

#### ***§ 63.3981 What definitions apply to this subpart?***

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

*Additive* means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

*Add-on control* means an air pollution control device, such as a thermal oxidizer or carbon adsorber, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

*Adhesive, adhesive coating* means any chemical substance that is applied for the purpose of bonding two surfaces together. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

*Assembled on-road vehicle coating* means any coating operation in which coating is applied to the surface of some component or surface of a fully assembled motor vehicle or trailer intended for on-road use including, but not limited to, components or surfaces on automobiles and light-duty trucks that have been repaired after a collision or otherwise repainted, fleet delivery trucks, and motor homes and other recreational vehicles (including camping trailers and fifth wheels). Assembled on-road vehicle coating includes the concurrent coating of parts of the assembled on-road vehicle that are painted off-vehicle to protect systems, equipment, or to allow full coverage. Assembled on-road vehicle coating does not include surface coating operations that meet the applicability criteria of the automobiles and light-duty trucks NESHAP. Assembled on-road vehicle coating also does not include the use of adhesives, sealants, and caulks used in assembling on-road vehicles.

*Capture device* means a hood, enclosure, room, floor sweep, or other means of containing or collecting emissions and directing those emissions into an add-on air pollution control device.

*Capture efficiency or capture system efficiency* means the portion (expressed as a percentage) of the pollutants from an emission source that is delivered to an add-on control device.

*Capture system* means one or more capture devices intended to collect emissions generated by a coating operation in the use of coatings or cleaning materials, both at the point of application and at subsequent points where emissions from the coatings and cleaning materials occur, such as flashoff, drying, or curing. As used in this subpart, multiple capture devices that collect emissions generated by a coating operation are considered a single capture system.

*Cleaning material* means a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (e.g., depainting or paint stripping), from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

*Coating* means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered coatings for the purposes of this subpart. A liquid plastic coating means a coating made from fine particle-size polyvinyl chloride (PVC) in solution (also referred to as a plastisol).

*Coating operation* means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning). A single coating operation may include any combination of these types of equipment, but always includes at least the point at which a given quantity of coating or cleaning material is applied to a given part and all subsequent points in the affected source where organic HAP are emitted from the specific quantity of coating or cleaning

material on the specific part. There may be multiple coating operations in an affected source. Coating application with handheld, non-refillable aerosol containers, touch-up markers, or marking pens is not a coating operation for the purposes of this subpart.

*Coatings solids* means the nonvolatile portion of the coating that makes up the dry film.

*Continuous parameter monitoring system (CPMS)* means the total equipment that may be required to meet the data acquisition and availability requirements of this subpart, used to sample, condition (if applicable), analyze, and provide a record of coating operation, or capture system, or add-on control device parameters.

*Controlled coating operation* means a coating operation from which some or all of the organic HAP emissions are routed through an emission capture system and add-on control device.

*Deviation* means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart including but not limited to, any emission limit or operating limit or work practice standard;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or
- (3) Fails to meet any emission limit, or operating limit, or work practice standard in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

*Emission limitation* means the aggregate of all requirements associated with a compliance option including emission limit, operating limit, work practice standard, etc.

*Enclosure* means a structure that surrounds a source of emissions and captures and directs the emissions to an add-on control device.

*Exempt compound* means a specific compound that is not considered a VOC due to negligible photochemical reactivity. The exempt compounds are listed in 40 CFR 51.100(s).

*Extreme performance fluoropolymer coating* means coatings that are formulated systems based on fluoropolymer resins which often contain bonding matrix polymers dissolved in non-aqueous solvents as well as other ingredients. Extreme performance fluoropolymer coatings are typically used when one or more critical performance criteria are required including, but not limited to a nonstick low-energy surface, dry film lubrication, high resistance to chemical attack, extremely wide operating temperature, high electrical insulating properties, or that the surface comply with government (e.g., USDA, FDA) or third party specifications for health, safety, reliability, or performance. Once applied to a substrate, extreme performance fluoropolymer coatings undergo a curing process that typically requires high temperatures, a chemical reaction, or other specialized technology.

*Facility maintenance* means the routine repair or renovation (including the surface coating) of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity.

*General use coating* means any material that meets the definition of coating but does not meet the definition of high performance coating, rubber-to-metal coating, magnet wire coating, or extreme performance fluoropolymer coating as defined in this section.

*High performance architectural coating* means any coating applied to architectural subsections which is required to meet the specifications of Architectural Aluminum Manufacturer's Association's publication number AAMA 605.2–2000.

*High performance coating* means any coating that meets the definition of high performance architectural coating or high temperature coating in this section.

*High temperature coating* means any coating applied to a substrate which during normal use must withstand temperatures of at least 538 degrees Celsius (1000 degrees Fahrenheit).

*Hobby shop* means any surface coating operation, located at an affected source, that is used exclusively for personal, noncommercial purposes by the affected source's employees or assigned personnel.

*Magnet wire coatings*, commonly referred to as magnet wire enamels, are applied to a continuous strand of wire which will be used to make turns (windings) in electrical devices such as coils, transformers, or motors. Magnet wire coatings provide high dielectric strength and turn-to-turn conductor insulation. This allows the turns of an electrical device to be placed in close proximity to one another which leads to increased coil effectiveness and electrical efficiency.

*Magnet wire coating machine* means equipment which applies and cures magnet wire coatings. *Manufacturer's formulation data* means data on a material (such as a coating) that are supplied by the material manufacturer based on knowledge of the ingredients used to manufacture that material, rather than based on testing of the material with the test methods specified in §63.3941. Manufacturer's formulation data may include, but are not limited to, information on density, organic HAP content, volatile organic matter content, and coating solids content.

*Mass fraction of organic HAP* means the ratio of the mass of organic HAP to the mass of a material in which it is contained, expressed as kg of organic HAP per kg of material.

*Month* means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

*Non-HAP coating* means, for the purposes of this subpart, a coating that contains no more than 0.1 percent by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 percent by mass for any other individual HAP.

*Organic HAP content* means the mass of organic HAP emitted per volume of coating solids used for a coating calculated using Equation 2 of §63.3941. The organic HAP content is determined for the coating in the condition it is in when received from its manufacturer or supplier and does not account for any alteration after receipt. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, organic HAP content is the mass of organic HAP that is emitted, rather than the organic HAP content of the coating as it is received.

*Permanent total enclosure (PTE)* means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51, for a PTE and that directs all the exhaust gases from the enclosure to an add-on control device.

*Personal watercraft* means a vessel (boat) which uses an inboard motor powering a water jet pump as its primary source of motive power and which is designed to be operated by a person or persons sitting, standing, or kneeling on the vessel, rather than in the conventional manner of sitting or standing inside the vessel.

*Protective oil* means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils. Protective oils used on miscellaneous metal parts and products include magnet wire lubricants and soft temporary protective coatings that are removed prior to installation or further assembly of a part or component.

*Reactive adhesive* means adhesive systems composed, in part, of volatile monomers that react during the adhesive curing reaction, and, as a result, do not evolve from the film during use. These volatile components instead become integral parts of the adhesive through chemical reaction. At least 70 percent of the liquid components of the system, excluding water, react during the process.

*Research or laboratory facility* means a facility whose primary purpose is for research and development of new processes and products, that is conducted under the close supervision of technically trained personnel, and is not engaged in the manufacture of final or intermediate products for commercial purposes, except in a de minimis manner.

*Responsible official* means responsible official as defined in 40 CFR 70.2.

*Rubber-to-metal coatings* are coatings that contain heat-activated polymer systems in either solvent or water that, when applied to metal substrates, dry to a non-tacky surface and react chemically with the rubber and metal during a vulcanization process.

*Startup, initial* means the first time equipment is brought online in a facility.

*Surface preparation* means use of a cleaning material on a portion of or all of a substrate. This includes use of a cleaning material to remove dried coating, which is sometimes called depainting.

*Temporary total enclosure* means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source as defined in Method 204 of appendix M, 40 CFR part 51.

*Thinner* means an organic solvent that is added to a coating after the coating is received from the supplier.

*Total volatile hydrocarbon (TVH)* means the total amount of nonaqueous volatile organic matter determined according to Methods 204 and 204A through 204F of appendix M to 40 CFR part 51 and substituting the term TVH each place in the methods where the term VOC is used. The TVH includes both VOC and non-VOC.

*Uncontrolled coating operation* means a coating operation from which none of the organic HAP emissions are routed through an emission capture system and add-on control device.

*Volatile organic compound (VOC)* means any compound defined as VOC in 40 CFR 51.100(s).

*Volume fraction of coating solids* means the ratio of the volume of coating solids (also known as the volume of nonvolatiles) to the volume of a coating in which it is contained; liters (gal) of coating solids per liter (gal) of coating.

*Wastewater* means water that is generated in a coating operation and is collected, stored, or treated prior to being discarded or discharged.

**Table 2 to Subpart Mmmm of Part 63—Applicability of General Provisions to Subpart Mmmm of Part 63**

You must comply with the applicable General Provisions requirements according to the following table:

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart</b>	<b>Mmmm Explanation</b>
§ 63.1(a)(1)-(14).....	General Applicability.	Yes.....	
§ 63.1(b)(1)-(3).....	Initial Applicability Determination.	Yes.....	Applicability to subpart Mmmm is also specified in § 63.3881.
§ 63.1(c)(1).....	Applicability After Standard Established.	Yes.....	
§ 63.1(c)(2)-(3).....	Applicability of Permit Program for Area Sources.	No.....	Area sources are not subject to subpart Mmmm.
§ 63.1(c)(4)-(5).....	Extensions and Notifications.	Yes.....	
§ 63.1(e).....	Applicability of Permit Program Before Relevant Standard is Set.	Yes.....	
§ 63.2.....	Definitions.....	Yes.....	Additional definitions are specified in § 63.3981.
§ 63.1(a)-(c).....	Units and Abbreviations.	Yes.....	
§ 63.4(a)(1)-(5).....	Prohibited Activities.	Yes.....	
§ 63.4(b)-(c).....	Circumvention/Severability.	Yes.....	
§ 63.5(a).....	Construction/Reconstruction.	Yes.....	
§ 63.5(b)(1)-(6).....	Requirements for Existing Newly Constructed, and Reconstructed Sources.	Yes.....	
§ 63.5(d).....	Application for Approval of Construction/Reconstruction.	Yes.....	
§ 63.5(e).....	Approval of Construction/Reconstruction.	Yes.....	
§ 63.5(f).....	Approval of Construction/Reconstruction Based on Prior State Review.	Yes.....	
§ 63.6(a).....	Compliance With Standards and Maintenance Requirements_Applicability.	Yes.....	
§ 63.6(b)(1)-(7).....	Compliance Dates for New and Reconstructed Sources.	Yes.....	Section § 63.3883 specifies the compliance dates.
§ 63.6(c)(1)-(5).....	Compliance Dates for Existing Sources.	Yes.....	Section § 63.3883 specifies the compliance dates.
§ 63.6(e)(1)-(2).....	Operation and Maintenance.	Yes.....	

Citation	Subject	Applicable to subpart	MMMM Explanation
§ 63.6(e)(3).....	Startup, Shutdown, and Malfunction Plan.	Yes.....	Only sources using an add-on control device to comply with the standard must complete startup, shutdown, and malfunction plans.
§ 63.6(f)(1).....	Compliance Except During Startup, Shutdown, and Malfunction.	Yes.....	Applies only to sources using an add-on control device to comply with the standard.
§ 63.6(f)(2)-(3).....	Methods for Determining Compliance..	Yes.....	
§ 63.6(g)(1)-(3).....	Use of an Alternative Standard.	Yes.....	
§ 63.6(h).....	Compliance With Opacity/Visible Emission Standards.	No.....	Subpart MMMM does not establish opacity standards and does not require continuous opacity monitoring systems (COMS).
§ 63.6(i)(1)-(16).....	Extension of Compliance.	Yes.....	
§ 63.6(j).....	Presidential Compliance Exemption.	Yes.....	
§ 63.7(a)(1).....	Performance Test Requirements_Applicability.	Yes.....	Applies to all affected sources. Additional requirements for performance testing are specified in § 63.3964, § 63.3965, and § 63.3966.
§ 63.7(a)(2).....	Performance Test Requirements_Dates.	Yes.....	Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standard. Section § 63.3960 specifies the schedule for performance test requirements that are earlier than those specified in § 63.7(a)(2).
§ 63.7(a)(3).....	Performance Tests Required By the Administrator.	Yes.....	

Citation	Subject	Applicable to subpart	MMMM Explanation
§ 63.7(b)-(e).....	Performance Test Requirements_Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test.	Yes.....	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§ 63.7(f).....	Performance Test Requirements_Use of Alternative Test Method.	Yes.....	Applies to all test methods except those used to determine capture system efficiency.
§ 63.7(g)-(h).....	Performance Test Requirements_Data Analysis, Recordkeeping, Reporting, Waiver of Test.	Yes.....	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§ 63.8(a)(1)-(3).....	Monitoring Requirements_Applicability.	Yes.....	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for monitoring are specified in § 63.3968.
§ 63.8(a)(4).....	Additional Monitoring Requirements.	No.....	Subpart Mmmm does not have monitoring requirements for flares.
§ 63.8(b).....	Conduct of Monitoring.	Yes.....	
§ 63.8(c)(1)-(3).....	Continuous Monitoring Systems (CMS) Operation and Maintenance.	Yes.....	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for monitoring are specified in § 63.3968.

Citation	Subject	Applicable to subpart	MMMM Explanation
§ 63.8(c)(4).....	CMS.....	No.....	§ 63.3968 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.
§ 63.8(c)(5).....	COMS.....	No.....	Subpart Mmmm does not have opacity or visible emission standards.
§ 63.8(c)(6).....	CMS Requirements.....	No.....	Section 63.3968 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply.
§ 63.8(c)(7).....	CMS Out-of-Control Periods.	Yes.....	
§ 63.8(c)(8).....	CMS Out-of-Control Periods and Reporting.	No.....	§ 63.3920 requires reporting of CMS out-of-control periods.
§ 63.8(d)-(e).....	Quality Control Program and CMS Performance Evaluation.	No.....	Subpart Mmmm does not require the use of continuous emissions monitoring systems.
§ 63.8(f)(1)-(5).....	Use of an Alternative Monitoring Method	Yes.....	
§ 63.8(f)(6).....	Alternative to Relative Accuracy Test.	No.....	Subpart Mmmm does not require the use of continuous emissions monitoring systems.
§ 63.8(g)(1)-(5).....	Data Reduction.....	No.....	Sections § 63.3967 and § 63.3968 specify monitoring data reduction.
§ 63.9(a)-(d).....	Notification Requirements.	Yes.....	
§ 63.9(e).....	Notification of Performance Test.	Yes.....	Applies only to capture system and add-on control device performance tests at sources using these to comply with the standard.
§ 63.9(f).....	Notification of Visible Emissions/Opacity Test.	No.....	Subpart Mmmm does not have opacity or visible emissions standards.

Citation	Subject	Applicable to subpart	MMMM Explanation
§ 63.9(g)(1)-(3).....	Additional Notifications When Using CMS.	No.....	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§ 63.9(h).....	Notification of Compliance Status	Yes.....	Section § 63.3910 specifies the dates for submitting the notification of compliance status.
§ 63.9(i).....	Adjustment of Submittal Deadlines	Yes.....	
§ 63.9(j).....	Change in Previous Information.	Yes.....	
§ 63.10(a).....	Recordkeeping/Reporting Applicability and General Information.	Yes.....	
§ 63.10(b)(1).....	General Recordkeeping Requirements.	Yes.....	Additional requirements are specified in § 63.3930 and § 63.3931.
§ 63.10(b)(2) (i)-(v).....	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS.	Yes.....	Requirements for startup, shutdown, and malfunction records only apply to add-on control devices used to comply with the standard.
§ 63.10(b)(2) (vi)-(xi).....	.....	Yes.....	
§ 63.10(b)(2) (xii).....	Records.....	Yes.....	
§ 63.10(b)(2) (xiii).....	.....	No.....	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§ 63.10(b)(2) (xiv).....	.....	Yes.....	
§ 63.10(b)(3).....	Recordkeeping Requirements for Applicability Determinations.	Yes.....	
§ 63.10(c) (1)-(6).....	Additional Recordkeeping Requirements for Sources with CMS.	Yes.....	
§ 63.10(c) (7)-(8).....	.....	No.....	The same records are required in § 63.3920(a)(7).
§ 63.10(c) (9)-(15).....	.....	Yes.....	
§ 63.10(d)(1).....	General Reporting Requirements.	Yes.....	Additional requirements are specified in § 63.3920.
§ 63.10(d)(2).....	Report of Performance Test Results.	Yes.....	Additional requirements are specified in § 63.3920(b).

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart</b>	<b>Mmmm Explanation</b>
§ 63.10(d)(3).....	Reporting Opacity or Visible Emissions Observations.	No.....	Subpart Mmmm does not require opacity or visible emissions observations.
§ 63.10(d)(4).....	Progress Reports for Sources With Compliance Extensions.	Yes.....	
§ 63.10(d)(5).....	Startup, Shutdown, and Malfunction Reports.	Yes.....	Applies only to add-on control devices at sources using these to comply with the standard.
§ 63.10(e) (1)-(2).....	Additional CMS Reports	No.....	Subpart Mmmm does not require the use of continuous emissions monitoring systems.
§ 63.10(e) (3).....	Excess Emissions/CMS Performance Reports	No.....	Section § 63.3920 (b) specifies the contents of periodic compliance reports.
§ 63.10(e) (4).....	COMS Data Reports.....	No.....	Subpart Mmmm does not specify requirements for opacity or COMS.
§ 63.10(f).....	Recordkeeping/Reporting Waiver.	Yes.....	
§ 63.11.....	Control Device Requirements/Flares.	No.....	Subpart Mmmm does not specify use of flares for compliance.
§ 63.12.....	State Authority and Delegations.	Yes.....	
§ 63.13.....	Addresses.....	Yes.....	
§ 63.14.....	Incorporation by Reference.	Yes.....	
§ 63.15.....	Availability of Information/Confidentiality.	Yes.....	

**Table 3 to Subpart M MMM of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends**

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data and which match either the solvent blend name or the chemical abstract series (CAS) number. If a solvent blend matches both the name and CAS number for an entry, that entry's organic HAP mass fraction must be used for that solvent blend. Otherwise, use the organic HAP mass fraction for the entry matching either the solvent blend name or CAS number, or use the organic HAP mass fraction from table 4 to this subpart if neither the name or CAS number match.

Solvent/solvent blend	CAS. No.	Average organic HAP mass fraction	Typical Organic HAP, percent by mass
1. Toluene.....	108-88-3	1.00	Toluene.
2. Xylene(s).....	1330-20-7	1.00	Xylenes, ethylbenzene.
3. Hexane.....	110-54-3	0.50	n-hexane.
4. n-Hexane.....	110-54-3	1.00	n-hexane.
5. Ethylbenzene.....	100-41-4	1.00	Ethylbenzene.
6. Aliphatic 140.....		0.00	None.
7. Aromatic 100.....		0.02	1% xylene, 1% cumene.
8. Aromatic 150.....		0.09	Naphthalene.
9. Aromatic naphtha.....	64742-95-6	0.02	1% xylene, 1% cumene.
10. Aromatic solvent.....	64742-94-5	0.10	Naphthalene.
11. Exempt mineral spirits..	8032-32-4	0.00	None.
12. Ligroines (VM & P).....	8032-32-4	0.00	None.
13. Lactol spirits.....	64742-89-6	0.15	Toluene.
14. Low aromatic white spirit.	64742-82-1	0.00	None.
15. Mineral spirits.....	64742-88-7	0.01	Xylenes.
16. Hydrotreated naphtha....	64742-48-9	0.00	None.
17. Hydrotreated light distillate.....	64742-47-8	0.00	Toluene.
18. Stoddard solvent.....	8052-41-3	0.01	Xylenes.
19. Super high-flash naphtha	64742-95-6	0.05	Xylenes.
20. Varsol solvent.....	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene.
21. VM & P naphtha.....	64742-89-8	0.06	3% toluene, 3% xylene.
22. Petroleum distillate mixture....	68477-31-6	0.08	4% naphthalene 4% biphenyl.

**Table 4 to Subpart M MMM of Part 63—Default Organic HAP Mass Fraction for Petroleum**

### **Solvent Groups <sup>a</sup>**

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

<b>Solvent type</b>	<b>Average organic HAP mass fraction</b>	<b>Typical organic HAP, percent by mass</b>
Aliphatic <sup>b</sup>	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic <sup>c</sup>	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene.

<sup>a</sup> Use this table only if the solvent blend does not match any of the solvent blends in Table 3 to this subpart by either solvent blend name or CAS number and you only know whether the blend is aliphatic or aromatic.

<sup>b</sup> Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

<sup>c</sup> Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

**Indiana Department of Environmental Management**  
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>J.M. Hutton &amp; Co., Inc.</b>
<b>Source Location (1):</b>	<b>1501 S. 8<sup>th</sup> Street, Richmond, IN 47375</b>
<b>Source Location (2):</b>	<b>1117 N. E Street, Richmond, IN 47375</b>
<b>County:</b>	<b>Wayne</b>
<b>SIC Code:</b>	<b>3995</b>
<b>Permit Renewal No.:</b>	<b>177-26604-00083</b>
<b>Permit Reviewer:</b>	<b>James Mackenzie</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from J.M. Hutton & Co., Inc. relating to the operation of a stationary burial casket manufacturing company.

**History**

On May 28, 2008, J.M. Hutton & Co., Inc. submitted an application to the OAQ requesting to renew its operating permit. J.M. Hutton & Co., Inc. was issued a Part 70 Operating Permit Renewal on February 11, 2005.

**Source Definition**

This casket manufacturing and surface coating company consists of two (2) plants:

- (a) Plant 1 is located at 1501 South 8<sup>th</sup> Street, Richmond, Indiana; and
- (b) Plant 2 is located at 1117 North E Street, Richmond, Indiana.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source, effective from the date of issuance of Part 70 permit T177-6466-00083, issued on September 25, 1998.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Plant 1:
  - (1) One (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:
    - (A) Six (6) surface coating booths, identified as S1, S2, S3, S4, S5, and S9, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting through stacks S001, S002, S003, S004, S005, and S009, respectively;
    - (B) One (1) surface coating booth, identified as S6, utilizing an electrostatic airless spray gun, with dry filters or equivalent for particulate control, and exhausting to stack S006.

Under NESHAP MMMM S1, S2, S3, S4, S5, S9 and S6 are considered existing affected sources because the construction of the source commenced prior to August 13, 2002 and the source is not reconstructed.

(b) Plant 2:

- (1) One (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of four (4) surface coating booths, constructed in 1994, identified as E1, E2, E3, and E4, each utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters for particulate control, and exhausting to stacks E001, E002, E003, and E004, respectively.

Under NESHAP MMMM E1, E2, E3 and E4 are considered existing affected sources because the construction of the source commenced prior to August 13, 2002 and the source is not reconstructed.

- (2) One (1) wooden casket surface coating line, constructed in 1979, with a maximum capacity of coating two (2) caskets per hour, consisting of three (3) surface coating booths identified as E7, E8, and E9, utilizing High Volume Low Pressure (HVLP) or equivalent application for E7 and E8, and manual hand-wipe application for E9, exhausting to stacks E007, E008, and E009, respectively; and
- (3) One (1) spray coating booth, identified as E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a High Volume Low Pressure (HVLP) or equivalent application with dry filters or equivalent for particulate control, and exhausting to stack E006.

Under NESHAP MMMM E6 is considered existing affected sources because the construction of the source commenced prior to August 13, 2002 and the source is not reconstructed.

- (4) One (1) 5.02 MMBtu/hr steam-generating wood-fired boiler, installed in 1973, located at Plant 2. [326 IAC 6-2-3]

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

- (a) One (1) 6.0 MMBtu/hr natural gas boiler, installed in 1994, located at Plant 1. [326 IAC 6-2-4]
- (b) One (1) 6.0 MMBtu/hr natural gas boiler, installed after 1998, located at Plant 2. [326 IAC 6-2-4]
- (c) One (1) woodworking operation located at Plant 2, with emissions controlled by two (2) cyclones. [326 IAC 6-3-2]
- (d) One (1) powder coating booth, approved for construction in 2008, for coating of stamped metal parts, equipped with manual electrostatic spray equipment, with a maximum coating rate of 38.4 pounds per hour, with powder overspray collected by one (1) cartridge style batch powder collector for reuse, which has been determined to be integral to the process. The emissions from this unit are less than the exemption levels specified in 326 IAC 2-1.1-3(e)(1).
- (e) Equipment for washing or drying fabricated glass or metal products, if no VOCs or HAPs as defined under Section 112(b) of the Clean Air Act are used in the process, and no gas, oil, or solid fuel is burned.[326 IAC 2-1.1-3(e)(45)(J) and 326 IAC 2-7-1(40)(P)(x)]

- (f) Application of new oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings. [326 IAC 2-7-1(21)(G)(vi)(AA)]
- (g) Replacement of equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 2-7-1(21)(G)(vi)(EE)]
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment. [326 IAC 2-7-1(21)(G)(x)(AA)]

### Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 177-17509-00083 on February 11, 2004. The source has since received the following approvals:

- (a) Administrative Amendment: No. 177-20327-00083, issued on July 20, 2005.
- (b) Significant Permit Modification: No. 177-22889-00083, issued on December 8, 2006.
- (c) Significant Permit Modification: No. 177-25575-00083, issued on February 6, 2006.

All terms and conditions of 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

There are no enforcement actions pending.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Wayne County

326 IAC 1-4-90 Wayne County

Authority: IC 13-14-8; IC 13-17-3-4; IC 13-17-3-11; IC 13-17-3-14

Affected: IC 13-15; IC 13-17

Sec. 90. The following attainment status designations are applicable to Wayne County:

Pollutant	Designation
CO	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> 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 PM <sub>2.5</sub> .	

- (a) Ozone Standards
- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
  - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
  - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
  - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>  
Wayne County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15<sup>th</sup>, 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 PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.
- (c) Other Criteria Pollutants  
Wayne County has been classified as attainment or unclassifiable in Indiana for CO, Pb, PM<sub>10</sub>, NO<sub>2</sub>, and SO<sub>2</sub>. 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.

**Unrestricted Potential Emissions**

<b>Pollutant</b>	<b>tons/year</b>
PM	82.6
PM <sub>10</sub>	82.4
SO <sub>2</sub>	0.58
VOC	442.2
CO	17.5
NO <sub>x</sub>	15.9

<b>HAPs</b>	<b>tons/year</b>
Toluene	165.3
Ethylene Glycol	68.7
Xlyene	5.7
Methyl Isobutyl Ketone	3.6
Other	1.8
<b>Total</b>	<b>245.1</b>

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 Volatile Organic Compounds 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/or 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.

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Potential to Emit After Issuance**

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 permit renewal, 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 (tons/year)					
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Surface Coating	3.4	3.4	-	< 245	-	-
Woodworking	6.6	6.6	-	-	-	-
Combustion - Two (2) Natural Gas Boilers	0.1	0.4	0.03	0.3	4.3	5.2
Combustion - One (1) Wood-Fired Boiler	8.8	8.3	0.55	0.4	13.2	10.8
Powder Coating	0.02	0.02	-	-	-	-
<b>Total</b>	<b>18.92</b>	<b>18.72</b>	<b>0.58</b>	<b>&lt; 250</b>	<b>17.5</b>	<b>16.0</b>
<b>Major Source Threshold</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>

This existing stationary source is not 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.

### Federal Rule Applicability

The following federal rules are applicable to the source:

#### NSPS

40 CFR 60.40c

The two (2) 6.0 MMBtu/hr natural gas boilers and one (1) steam-generating wood-fired boiler listed as insignificant activities are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40c, Subpart Dc, because their heat input capacities are each less than 10 MMBtu/hr.

#### NESHAP

40 CFR Part 63

The affected source is subject to the provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products), effective January 2, 2007. Pursuant to 40 CFR 63.3883(b), the Permittee shall comply with these requirements on and after the date that is three years after the effective date of the rule.

Nonapplicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart M:

- (1) 40 CFR 63.3881 (a)(1), (a)(2), and (b);
- (2) 40 CFR 63.3882;
- (3) 40 CFR 63.3883 (b);
- (4) 40 CFR 63.3890 (b)(1);
- (5) 40 CFR 63.3891 (a) and (b);
- (6) 40 CFR 63.3892 (a);
- (7) 40 CFR 63.3893 (a);
- (8) 40 CFR 63.3900 (a)(1) and (b);
- (9) 40 CFR 63.3901;
- (10) 40 CFR 63.3910, except 40 CFR 63.3910 (c)(8)(iii), (9), (10) and (11);
- (11) 40 CFR 63.3920, except 40 CFR 63.3920 (a)(7), (b) and (c);
- (12) 40 CFR 63.3930, except 40 CFR 63.3930 (c)(4) and (k);
- (13) 40 CFR 63.3931;
- (14) 40 CFR 63.3940;
- (15) 40 CFR 63.3941;
- (16) 40 CFR 63.3942;
- (17) 40 CFR 63.3950;
- (18) 40 CFR 63.3951;
- (19) 40 CFR 63.3952;
- (20) 40 CFR 63.3980; and
- (21) 40 CFR 63.3981.
- (22) Table 2 -- Applicability of General Provisions to Subpart M of Part 63
- (23) Table 3 -- Default Organic HAP Mass Fraction for Solvents and Solvent Blends
- (24) Table 4 -- Default Organic HAP Mass Fraction for Petroleum Solvent Groups

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart M.

### State Rule Applicability - Entire Source

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

The source has submitted an Emergency Reduction Plan (ERP) on August 22, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

The uncontrolled VOC emissions are greater than 250 tons per year. The source has taken the following limit to stay a minor source under PSD:

The VOC usage, including coatings, dilution solvents, and cleaning solvents at all surface coating booths (E1, E2, E3, E4, E6, E7, E8, E9, S1, S2, S3, S4, S5, S6, and S9) shall be less than two hundred forty-eight (248) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

This usage limit is required to limit the source-wide VOC PTE to less than two hundred fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### 326 IAC 8-2 (Surface Coating Emission Limitations)

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 8-2-9 (Miscellaneous Metal Coating Operations), this rule applies to facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls. The powder coating booth is not subject to the requirements of 326 IAC 8-2-9 because spray application of the dry powder coatings does not emit VOCs.

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

326 IAC 8-1-6 applies to facilities, as of January 1, 1980, that have potential emissions of twenty-five (25) tons or more per year, located anywhere in the state, and not otherwise regulated by another provision of 326 IAC 8, 326 IAC 20-48, or 326 IAC 20-56. The powder coating booth will not emit VOCs; therefore it is not subject to 326 IAC 8-1-6.

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

IDEM, OAQ has evaluated the powder coating recovery system as an integral part of the powder coating booth and the potential to emit particulates was determined after the powder coating recovery system. Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from 326 IAC 6-3, which is less than 0.551 pounds per hour. Therefore the powder coating booth is not subject to 326 IAC 6-3.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially, by July 1, beginning in 2005. Therefore, the next emission statement for this source must be submitted by July 1, 2011. 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 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.

<b>State Rule Applicability – Individual Facilities</b>
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326 IAC 6-3-2(d) (Process Operations)

Dry filters shall be in operation at all times the surface coating booths are in operation and shall be operated in accordance with manufacturer's specifications, in order to comply with this limit.

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

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) is not applicable to the metal surface coating at this source. This rule applies to surface coating of burial caskets (Standard Industrial Classification Code 3995) in or adjacent to a county designated as nonattainment for ozone. This source is located in Wayne County. Wayne County and all adjacent counties are designated as attainment for ozone.

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

(a) Pursuant to Construction Permit CP-177-3462-00054, issued September 27, 1994, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the VOC emissions from the metal casket surface coating line, located at Plant 1, consisting of seven (7) surface coating booths, identified as S1, S2, S3, S4, S5, S6, and S9, shall utilize Best Available Control Technology (BACT) as described below:

- (1) Utilize six (6) High Volume Low Pressure (HVLP) or equivalent spray guns and one (1) electrostatic airless spray gun with a minimum transfer efficiency of 65% for each spray gun.
- (2) High Volume Low Pressure (HVLP) or equivalent spray guns and/or the electrostatic airless spray gun shall be used at all times that the coating line is operated.

This condition has been updated to include application systems equivalent to or better than HVLP in regards to transfer efficiency and emissions.

(b) Pursuant to CP-177-3461-00053, issued October 25, 1994, and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the metal casket surface coating line, located at Plant 2, consisting of four (4) surface coating booths, identified as E1, E2, E3, and E4, shall utilize Best Available Control Technology (BACT) as described below:

- (1) Utilize High Volume Low Pressure (HVLP) or equivalent application equipment at all times that the booths are in operation, with the exception of shading operations.

(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.)

- (2) Air atomization equipment may be used for shading operations (shading involves the application of a narrow line of coating on the casket).
- (3) Water base primer shall be used for all primer applications due to the significantly reduced concentrations of VOC.

This condition has been updated to include application systems equivalent to or better than HVLP in regards to transfer efficiency and emissions.

- (c) The surface coating booth, identified as E6, located at Plant 2, is not otherwise regulated by other provisions of 326 IAC 8, and is subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because it was constructed after January 1, 1980, and has potential emissions of twenty-five (25) tons or more per year. Based on the above limitation, 326 IAC 8-1-6 does apply. However, the permittee has taken a limit on VOC of less than 25 tons per year.

Pursuant to T177-6466-00083, issued on September 25, 1998, the input VOC usage to the surface coating booth, identified as E6, located at Plant 2, shall not exceed twenty-five (25.0) tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents.

- (d) The wooden casket surface coating line, constructed in 1979, located at Plant 2, which consists of three (3) surface coating booths, identified as E7, E8, and E9, is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because it was constructed before January 1, 1980.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 (Organic Solvent Emission Limitations) is not applicable to the wooden casket surface coating line, constructed in 1979, located in Plant 2, because the unrestricted potential to emit VOC is less than 100 tons per year.

#### 326 IAC 4-2 (Incinerators)

The steam-generating wood-fired boiler located in Plant 2 uses only untreated, non-coated wood from the insignificant woodworking operation as fuel, and is used to heat the building from October through April. From May through September, the boiler is not used to heat the building, and it exhausts to the atmosphere. The steam-generating wood-fired boiler is not considered to be an incinerator. Pursuant to 326 IAC 1-2-34, an incinerator is defined as an engineered apparatus that burns waste substances with controls on combustion factors including, but not limited to, temperature, retention time, and air. The steam-generating wood-fired boiler is designed to be a source of indirect heating, that is fueled by untreated, unprocessed wood. Therefore, the requirements of 326 IAC 4-2 do not apply.

#### 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter (PM) from one (1) steam-generating wood-fired boiler, rated at 5.02 MMBtu/hr heat input, installed in 1973, located at Plant 2, shall be limited to 0.6 pounds per MMBtu heat input. The steam-generating wood-fired boiler is subject to the requirements of 326 IAC 6-2-3 because it was installed before September 21, 1983.

This emission limit was calculated from the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

- Where:
- C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter ( $\mu\text{m}^3$ ) for a period not to exceed a sixty (60) minute time period.
  - Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu). For this condition, Pt is calculated to be 10.4 lb/MMBtu.
  - Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For this condition, the total source maximum operating capacity rating is 5.02 MMBtu/hr.
  - N = Number of stacks in fuel burning operation. For this condition, the number of stacks is one (1).
  - a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input.
  - h = Stack height in feet. For this condition, the stack height is eighty (80) feet.

The steam-generating wood-fired boiler is in compliance with 326 IAC 6-2-3 because it has potential particulate matter emissions of 0.4 pounds per MMBtu heat input.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) The natural gas-fired boiler located at Plant 1 is subject to the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because it was installed after September 21, 1983. Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the one (1) 6.0 MMBtu/hr natural gas boiler, installed in 1994, located at Plant 1 shall be limited to 0.58 pounds per MMBtu heat input.

This limit is based on the following equation:

$$PT = \frac{1.09}{Q^{0.26}}$$

- Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For this condition, the total source maximum operating capacity rating is (5.02 + 6.0) = 11.02 MMBtu/hr.

- (b) The natural gas-fired boiler located at Plant 2 is subject to the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because it was installed after September 21, 1983. Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the one (1) 6.0 MMBtu/hr natural gas boiler, installed after 1998, located at Plant 2 shall be limited to 0.52 pounds per MMBtu heat input.

- Where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. For this condition, the total source maximum operating capacity rating is (5.02 + 6.0 + 6.0) = 17.02 MMBtu/hr.

Each natural gas-fired boiler is in compliance with 326 IAC 6-2-4 because each boiler has potential particulate matter emissions of 0.002 pounds per MMBtu heat input.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation shall not exceed 2.1 pounds per hour, when operating at a process weight rate of 756 pounds per hour.

The pounds per hour limitation is based on the following:

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 two (2) cyclones shall be operating at all times the woodworking is in operation, in order to comply with this limit. The woodworking operation is in compliance with this limit because the potential to emit is 1.5 pounds per hour.

**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 monitoring requirements applicable to this source are as follows:

**Plant 1**

<b>Emission Unit/location</b>	<b>Control Device</b>	<b>Timeframe for Inspection / Observation</b>	<b>Pollutant</b>	<b>Requirement</b>
<b>Surface Coating: S1,S2,S3,S6,S4,S5,S9</b>	Dry Filter	Daily	Particulate Matter	Placement, Integrity, Particle Loading
<b>Stacks: S001,S002,S003,S004, S005,S006,S009</b>	Dry Filter	Weekly	Particulate Matter	Overspray at stack
<b>Stacks: S001,S002,S003,S004, S005,S006,S009</b>	Dry Filter	Monthly	Particulate Matter	Overspray at rooftop & nearby ground

**Plant 2**

<b>Emission Unit/Location</b>	<b>Control Device</b>	<b>Timeframe for Inspection / Observation</b>	<b>Pollutant</b>	<b>Requirement</b>
<b>HVLP: E1,E2,E3,E4,E6,E7, E8,E9</b>	Dry Filter	Daily	Particulate Matter	Placement, Integrity, Particle Loading
<b>Woodworking: Cyclone Stack</b>	Cyclone	Daily	Particulate Matter	Visible Emissions
<b>Stacks: E001,E002,E003,E006, E007,E008,E009</b>	Dry Filter	Weekly	Particulate Matter	Overspray at stack
<b>Stacks: E001,E002,E003,E006, E007,E008,E009</b>	Dry Filter	Monthly	Particulate Matter	Overspray at rooftop & nearby ground

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Operating Permit 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 and additional information submitted by the applicant.

An application for the purposes of this review was received on May 28, 2008.

**Conclusion**

The operation of this casket manufacturing and surface coating company shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 177-26604-00083.

**Potential to Emit Summary - Unlimited (tons/yr)**

Process	PM	PM10	SO2	NOx	VOC	CO	Single HAP	Total HAPs
Surface Coating <sup>1</sup>	67.2	67.2	--	--	441.5	--	165.3 (Toluene)	244.3
Woodworking <sup>1</sup>	6.6	6.6	--	--	--	--	--	--
Two (2) 6.0 MMBtu/hr Natural Gas Boilers <sup>2</sup>	0.1	0.4	0.03	5.2	0.28	4.3	0.1 (Hexane)	0.1
One (1) 5.02 MMBtu/hr Wood-Fired Boiler <sup>3</sup>	8.8	8.3	0.55	10.8	0.37	13.2	0.4 (HCl)	0.7
Powder Coating Booth <sup>4</sup>	0.02	0.02	--	--	--	--	--	--
<b>Total</b>	<b>82.6</b>	<b>82.4</b>	<b>0.58</b>	<b>15.9</b>	<b>442.2</b>	<b>17.5</b>	<b>165.3 (Toluene)</b>	<b>245.1</b>

<sup>1</sup>These emission calculations are those as determined in Part 70 Operating Permit Renewal No. 177-17509-00083, issued on February 11, 2004.

<sup>2</sup>These emission calculations are those as determined on pages 1 and 2 of this Appendix.

<sup>3</sup>These emission calculations are those as determined on pages 3 and 4 of this Appendix.

<sup>4</sup>These emission calculations after control equipment, which has been determined to be integral to the process.

**Limited Potential to Emit Summary - Limited (tons/yr)**

Process	PM	PM10	SO2	NOx	VOC	CO	Single HAP	Total HAPs
Surface Coating	3.4	3.4	--	--	< 248	--	< 92.8 (Toluene)	< 192.1
Woodworking	6.6	6.6	--	--	--	--	--	--
Two (2) 6.0 MMBtu/hr Natural Gas Boilers	0.1	0.4	0.03	5.2	0.3	4.3	0.1 (Hexane)	0.1
One (1) 5.02 MMBtu/hr Wood-Fired Boiler	8.8	8.3	0.55	10.8	0.4	13.2	0.4 (HCl)	0.7
Powder Coating Booth	0.02	0.02	--	--	--	--	--	--
<b>Total</b>	<b>18.92</b>	<b>18.72</b>	<b>0.58</b>	<b>16.0</b>	<b>&lt; 250</b>	<b>17.5</b>	<b>&lt; 92.8 (Toluene)</b>	<b>&lt; 193.0</b>

(Calculation note as #1 above.)

\*The total source-wide VOC emissions shall be limited to less than 250 tons per twelve (12) consecutive month period to render the requirements of 326 IAC 2-2 not applicable.

\*The source has requested a VOC limit for surface coating operations of 248 tons per year. (Limit change to 245 for Part 70 Operating Permit Renewal 177-26604-00083)

\*This is equivalent to an operational limitation of 248 tpy / 441.51 tpy = 0.5617 or 56.17%

\*Limited HAP Emissions (tons/yr) = Unlimited HAP Emissions (tons/yr) \* Operational Limitation Equivalent

\*The control efficiency of the dry filters for particulate control of the spray booths is allowed as 95%.

VOC and Particulate  
 From Surface Coating Operations

Plant 1

Material	Booth	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Vol. % Water	Vol. % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC pounds per hour	PTE VOC pounds per day	PTE VOC tons per year	PTE Particulate (ton/yr)	lb VOC/gal solids	Transfer Efficiency
WB Primer*	S1	10.07	0.6	48%	10.51%	58%	28%	0.43	11.00	2.5	1.1	5.0	119.6	21.8	30.1	5.9	0.7
HH Brush*	S2	7.14	88%	0%	87.66%	0%	9%	0.03	11.00	6.3	6.3	2.0	47.9	8.7	0.4	105.7	0.7
Touch-Up Primer*	S3	8.46	70%	0%	69.78%	0%	16%	0.02	11.00	5.9	5.9	1.2	28.1	5.1	0.8	55.8	0.7
Color NM	S4	9.11	62%	0%	61.52%	0%	21%	0.02	11.00	5.6	5.6	1.1	26.6	4.9	1.1	40.4	0.7
Color M*	S4	7.65	82%	0%	82.11%	0%	11%	0.06	11.00	6.3	6.3	3.8	91.2	16.6	1.3	85.9	0.7
These emission calculations	S4	7.53	84%	0%	83.88%	0%	9%	0.00	11.00	6.3	6.3	0.2	5.0	0.9	0.1	110.0	0.7
HD Dye	S4	7.11	90%	0%	90.46%	0%	7%	0.01	11.00	6.4	6.4	0.6	15.3	2.8	0.1	143.0	0.7
WB Color	S4	8.90	69%	59%	10.05%	63%	25%	0.01	11.00	2.4	0.9	0.1	1.9	0.3	0.4	5.5	0.7
Color NM	S5	9.11	62%	0%	61.52%	0%	21%	0.02	11.00	5.6	5.6	1.1	26.6	4.9	1.1	40.4	0.7
Color M*	S5	7.65	82%	0%	82.11%	0%	11%	0.06	11.00	6.3	6.3	3.8	91.2	16.6	1.3	85.9	0.7
NM Ready	S5	7.53	84%	0%	83.88%	0%	9%	0.00	11.00	6.3	6.3	0.2	5.0	0.9	0.1	110.0	0.7
HD Dye	S5	7.11	90%	0%	90.46%	0%	7%	0.01	11.00	6.4	6.4	0.6	15.3	2.8	0.1	143.0	0.7
WB Color	S5	8.90	69%	59%	10.05%	63%	25%	0.01	11.00	2.4	0.9	0.1	1.9	0.3	0.4	5.5	0.7
Color NM*	S9	9.11	62%	0%	61.52%	0%	21%	0.01	11.00	5.6	5.6	0.5	11.8	2.2	0.5	40.4	0.7
Color M	S9	7.65	82%	0%	82.11%	0%	11%	0.00	11.00	6.3	6.3	0.1	3.3	0.6	0.0	85.9	0.7
NM Ready	S9	7.53	84%	0%	83.88%	0%	9%	0.00	11.00	6.3	6.3	0.0	0.0	0.0	0.0	110.0	0.7
HD Dye	S9	7.11	90%	0%	90.46%	0%	7%	0.00	11.00	6.4	6.4	0.0	0.0	0.0	0.0	143.0	0.7
WB Color	S9	8.90	69%	59%	10.05%	63%	25%	0.00	11.00	2.4	0.9	0.0	0.0	0.0	0.0	5.5	0.7
Reflow Acrylic*	S6	7.62	78%	0%	77.60%	0%	18%	0.30	11.00	5.9	5.9	19.7	473.0	86.3	8.7	49.6	0.7
(Calculation note as #1 above.)																	
Total Solvent Usage	All Booths	6.65	100%	0%	100.00%	0%	0%	0.08	11.00	6.7	6.7	5.9	142.2	26.0	0.0	0.0	1.0

\*The source has requested a VOC limit for surface coating operations of 248 tons per year. (Limit change to 245 for Part 70 Operating Permit Renewal 177-26604-00083)

State Potential Emissions

Add worst case coating to all solvents

46 1106 201.8 46

\*These coatings represent worst-case VOC and PM emissions and were used to determine total potential VOC emissions. The potential VOC emissions for touch-up booth E4 are not shown because the emissions have been accounted for in booths E1, E2, and E3

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)  
 Total = Worst Coating + Sum of all solvents used

Electrostatic Powder Coating; Booth S6

Material Name	Weight Percent Solids	Maximum Powder Throughput (lbs/hr)	Application Method	Transfer Efficiency	Maximum Overspray Rate (lbs/hr)	Maximum Overspray Rate (tons/yr)	Removal Efficiency	PTE for PM/PM10* (lbs/hr)	PTE for PM/PM10* (tons/yr)
Powder Coating	100%	38.4	Electrostatic	60.0%	15.36	67.28	99.97%	0.005	0.02

The coating powder material does not contain VOC or HAPs.  
 \* IDEM, OAQ has evaluated the justifications and agreed that the fabric filter will be considered as an integral part of the electrostatic powder coat booth

Methodology

Maximum Overspray Rate (lbs/hr) = Maximum Powder Throughput (lbs/hr) \* (1 - Transfer Efficiency)  
 Maximum Overspray Rate (tons/yr) = Maximum Overspray Rate (lbs/hr) \* (8760 hrs/yr) \* (1 ton / 2000 lbs)  
 PTE of PM/PM10 (lbs/hr) = Maximum Powder Throughput (lbs/hr) x Weight Percent Solids x (1- Control Efficiency)  
 PTE of PM/PM10 (tons/yr) = PTE of PM/PM10 (lbs/hr) \* (8760 hrs/yr) \* (1 ton / 2000 lbs)

**HAP Emission Calculations**

**Plant 1**

Material	Booth	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MlK	Weight % MEK	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MlBk Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
WB Primer*	S1	10.07	0.43	11.00	0.00%	0.00%	0.00%	0.00%	9.00%	0.000	0.000	0.000	18.689
HH Brush*	S2	7.14	0.03	11.00	0.00%	30.00%	0.00%	5.00%	0.00%	0.000	2.993	0.000	0.000
Touch-Up Primer*	S3	8.46	0.02	11.00	11.00%	20.00%	16.00%	16.00%	0.00%	0.807	1.467	1.174	0.000
Color NM	S4	9.11	0.02	11.00	2.00%	36.00%	0.00%	5.00%	5.00%	0.158	2.844	0.000	0.395
Color M*	S4	7.65	0.06	11.00	0.00%	51.00%	0.00%	0.00%	0.00%	0.000	10.339	0.000	0.000
NM Ready	S4	7.53	0.00	11.00	1.00%	31.00%	0.00%	13.00%	3.00%	0.011	0.337	0.000	0.033
HD Dye	S4	7.11	0.01	11.00	0.00%	19.00%	0.00%	23.00%	0.00%	0.000	0.586	0.000	0.000
<sup>†</sup> These emission calculations	S4	8.90	0.01	11.00	0.00%	0.00%	0.00%	0.00%	10.00%	0.000	0.000	0.000	0.343
Color NM	S5	9.11	0.02	11.00	2.00%	36.00%	0.00%	5.00%	5.00%	0.158	2.844	0.000	0.395
Color M*	S5	7.65	0.06	11.00	0.00%	51.00%	0.00%	0.00%	0.00%	0.000	10.339	0.000	0.000
NM Ready	S5	7.53	0.00	11.00	1.00%	31.00%	0.00%	13.00%	3.00%	0.011	0.337	0.000	0.033
HD Dye	S5	7.11	0.01	11.00	0.00%	19.00%	0.00%	23.00%	0.00%	0.000	0.586	0.000	0.000
WB Color	S5	8.90	0.01	11.00	0.00%	0.00%	0.00%	0.00%	10.00%	0.000	0.000	0.000	0.343
Color NM*	S9	9.11	0.01	11.00	2.00%	36.00%	0.00%	5.00%	5.00%	0.070	1.264	0.000	0.176
Color M	S9	7.65	0.00	11.00	0.00%	51.00%	0.00%	0.00%	0.00%	0.000	0.376	0.000	0.000
NM Ready	S9	7.53	0.00	11.00	1.00%	31.00%	0.00%	13.00%	3.00%	0.000	0.000	0.000	0.000
HD Dye	S9	7.11	0.00	11.00	0.00%	19.00%	0.00%	23.00%	0.00%	0.000	0.000	0.000	0.000
WB Color	S9	8.90	0.00	11.00	0.00%	0.00%	0.00%	0.00%	10.00%	0.000	0.000	0.000	0.000
Reflow Acrylic*	S6	7.62	0.30	11.00	2.00%	32.00%	0.00%	10.00%	10.00%	2.225	35.597	0.000	11.124
Total Solvent Usage	All Booths	6.65	0.08	11.00	0.00%	30.00%	0.00%	20.00%	20.00%	0.000	7.786	0.000	5.190

(Calculation note as #1 above.)

Total State Potential Emissions

\*The source has requested a VOC limit for surface coating operations of 248 tons per year. (Limit change to 245 for Part 70 Operating Permit Renewal 177-26604-00083)

\*These coatings represent worst-case HAP emissions and were used to determine total potential HAP emissions.

3.44	77.69	1.17	36.72
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Total HAP (tpy): **119.03**

VOC and Particulate  
 From Surface Coating Operations

Plant 2

Material	Booth	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC pounds per hour	PTE VOC pounds per day	PTE VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
METAL LINE																	
WB Primer*	E1	10.07	59%	48%	10.51%	58%	28%	0.22	5.00	2.53	1.058	1.169	28	5.1	7.062	5.882	0.7
HH Primer*	E6	7.84	79%	0%	79.46%	0%	11%	0.09	5.00	6.23	6.230	2.648	64	11.6	1.049	85.956	0.7
Color NM	E2	9.11	62%	0%	61.52%	0%	21%	0.05	5.00	5.60	5.604	1.317	32	5.8	1.263	40.366	0.7
Color M*	E2	7.65	82%	0%	82.11%	0%	11%	0.16	5.00	6.28	6.281	4.962	119	21.7	1.657	85.900	0.7
NM Ready	E2	7.53	84%	0%	83.88%	0%	9%	0.01	5.00	6.32	6.316	0.221	5	1.0	0.065	110.047	0.7
*These emission calculat	E2	7.11	90%	0%	90.46%	0%	7%	0.02	5.00	6.43	6.432	0.611	15	2.7	0.099	142.990	0.7
Reflow Acrylic*	E3	7.62	78%	0%	77.60%	0%	18%	0.47	5.00	5.91	5.913	13.807	331	60.5	6.110	49.630	0.7
Thinner*	E2, E3, E6	6.65	100%	0%	100.00%	0%	0%	0.56	5.00	6.65	6.650	18.454	443	80.8	0.000	0.000	1.0
WOOD LINE																	
Stain*	E7	8.19	85%	0%	85.25%	0%	31%	0.15	2.00	6.98	6.982	2.081	50	9.1	0.552	34.954	0.7
Sealer*	E7	7.57	79%	0%	78.54%	0%	16%	0.50	2.00	5.95	5.945	5.910	142	25.9	2.475	55.979	0.7
Hot Lacquer*	E8	7.71	77%	0%	77.23%	0%	18%	0.02	2.00	5.95	5.954	0.262	6	1.1	0.118	50.195	0.7
Velvet Lacquer*	E8	7.42	79%	0%	78.83%	0%	16%	0.09	2.00	5.85	5.849	1.006	24	4.4	0.414	56.277	0.7
Hot Lacquer*	E9	7.71	77%	0%	77.23%	0%	18%	0.02	2.00	5.95	5.954	0.262	6	1.1	0.000	32.627	1.0
Velvet Lacquer*	E9	7.42	79%	0%	78.83%	0%	16%	0.09	2.00	5.85	5.849	1.006	24	4.4	0.000	36.580	1.0
Thinner*	E7, E8, E9	6.20	100%	0%	100.00%	0%	0%	0.08	2.00	6.20	6.200	1.004	24	4.4	0.000	0.000	1.0

State Potential Emissions Add worst case coating to all solvents  
 \*These coatings represent worst-case VOC and PM emissions and were used to determine total potential VOC emissions.

Totals = 

54.720	1313	239.7	20.865
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(Calculation note as #1 above.)

The potential VOC emissions for touch-up booth E4 are not shown because the emissions have been accounted for in booths E1, E2, and E3

\*The source has requested a VOC limit for surface coating operations of 248 tons per year. (Limit change to 245 for Part 70 Operating Permit Renewal 177-26604-00083)

METHODOLOGY

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

HAP Emission Calculations

Plant 2

Material	Booth	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIK	Weight % MEK	Weight % Di. Ptha.	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MibK Emissions (ton/yr)	Di. Ptha. Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
METAL LINE															
WB Primer*	E1	10.07	0.22	5.00	0.00%	0.00%	0.00%	0.00%	0.00%	9.00%	0.00	0.00	0.00	0.00	4.386
HH Primer*	E6	7.84	0.09	5.00	11.00%	20.00%	16.00%	16.00%	0.00%	3.00%	1.61	2.92	2.34	0.00	0.438
Color NM	E2	9.11	0.05	5.00	2.00%	36.00%	0.00%	5.00%	0.00%	5.00%	0.19	3.38	0.00	0.00	0.469
Color M*	E2	7.65	0.16	5.00	0.00%	51.00%	0.00%	0.00%	0.00%	0.00%	0.00	13.50	0.00	0.00	0.000
NM Ready	E2	7.53	0.01	5.00	1.00%	31.00%	0.00%	13.00%	0.00%	0.00%	0.01	0.36	0.00	0.00	0.000
*These emission calculation	E2	7.11	0.02	5.00	0.00%	19.00%	0.00%	23.00%	0.00%	0.00%	0.00	0.56	0.00	0.00	0.000
Reflow Acrylic*	E3	7.62	0.47	5.00	2.00%	32.00%	0.00%	10.00%	0.00%	10.00%	0.00	24.94	0.00	0.00	7.793
Thinner*	E2, E3, E6	6.65	0.56	5.00	0.00%	30.00%	0.00%	20.00%	0.00%	20.00%	0.00	24.25	0.00	0.00	16.165
WOOD LINE															
Stain*	E7	8.19	0.15	2.00	1.00%	3.00%	0.00%	0.00%	0.00%	10.00%	0.11	0.32	0.00	0.00	1.069
Sealer*	E7	7.57	0.50	2.00	0.00%	43.00%	0.00%	6.00%	0.00%	5.00%	0.00	14.17	0.00	0.00	1.648
Hot Lacquer*	E8	7.71	0.02	2.00	0.00%	28.00%	0.00%	4.00%	3.00%	0.00%	0.00	0.42	0.00	0.04	0.000
Velvet Lacquer*	E8	7.42	0.09	2.00	0.00%	21.00%	0.00%	9.00%	1.00%	0.00%	0.00	1.17	0.00	0.06	0.000
Hot Lacquer*	E8	7.71	0.02	2.00	0.00%	28.00%	0.00%	4.00%	3.00%	0.00%	0.00	0.42	0.00	0.04	0.000
Velvet Lacquer*	E8	7.42	0.09	2.00	0.00%	21.00%	0.00%	9.00%	1.00%	0.00%	0.00	1.17	0.00	0.06	0.000
Thinner*	E7, E8, E9	6.20	0.08	2.00	8.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.35	0.00	0.09	0.00	0.000

Total State Potential Emissions

2.26	87.57	2.42	0.20	31.97
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(Calculation note as #1 above.)

\*These coatings represent worst-case HAP emissions and were used to determine total potential HAP emissions.

\*The source has requested a VOC limit for surface coating operations of 248 tons per year. (Limit change to 245 for Part 70 Operating Permit Renewal 177-26604-00083)

Total HAP (tpy): **124.43**

METHODOLOGY

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

Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler installed 1994

**Plant 1**

Heat Input Capacity MMBtu/hr	6.00	Potential Throughput MMCF/yr	51.5
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<sup>†</sup>These emission calculations are those as determined in Part 70 Operating Permit Renewal No. 177-17509-00083, issued on February 11, 2004.

Heat Input Capacity includes one (1) natural gas-fired boiler rated at 6.0 MMBtu/hr located at Plant 1; and one (1) natural gas-fired boiler rated at 6.0 MMBtu/hr located at Plant 2.

Per 326 IAC 6-2-4, PM emission rate shall be limited to: **0.58 lb/MMBtu**

where,

$$Q_{total} = (5.02 + 6.0) \text{ MMBtu/hr}$$

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100	5.5	84
**see below						
Potential Emission in tons/yr	4.90E-02	1.96E-01	1.55E-02	2.58E+00	1.42E-01	2.16E+00

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

(Calculation note as #1 above.)

All emission factors are based on normal firing.

<sup>†</sup>The source has requested a VOC limit for surface coating operations of 248 tons per year. (Limit change to 245 for Part 70 Operating Permit Renewal 177-26604-00083)

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)

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

Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions

**Plant 1**

**HAPs - Organics**

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03
Potential Emission in tons/yr	5.41E-05	3.09E-05	1.93E-03	4.64E-02	8.76E-05

**HAPs - Metals**

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	1.29E-05	2.83E-05	3.61E-05	9.79E-06	5.41E-05

**Total HAPs, tons/yr = 0.049**

Methodology is the same as page 1.

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

**Plant 2**  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler installed after 1998

Heat Input Capacity MMBtu/hr	6.00
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Potential Throughput MMCF/yr	51.5
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\*These emission calculations are those as determined in Part 70 Operating Permit Renewal No. 177-17509-00083, issued on February 11, 2004.  
 one (1) natural gas-fired boiler rated at 6.0 MMBtu/hr located at Plant 2.

Per 326 IAC 6-2-4, PM emission rate shall be limited to: **0.52 lb/MMBtu**

where,

$$Q_{total} = (5.02 + 6.0 + 6.0) \text{ MMBtu/hr}$$

Pollutant	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	4.90E-02	1.96E-01	1.55E-02	**see below	1.42E-01	2.16E+00

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

(Calculation note as #1 above.)

MMBtu = 1,000,000 Btu

\*The source has requested a VOC limit for surface coating operations of 248 tons per year. (Limit change to 245 for Part 70 Operating Permit Renewal 177-26604-00083)

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 7/98)

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

**HAPs - Organics**

Hazardous Air Pollutant	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03
Potential Emission in tons/yr	5.41E-05	3.09E-05	1.93E-03	4.64E-02	8.76E-05

**HAPs - Metals**

Hazardous Air Pollutant	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	1.29E-05	2.83E-05	3.61E-05	9.79E-06	5.41E-05

**Total HAP's, tons/yr = 0.049**

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

Appendix A: Emissions Calculations  
 External Combustion Boiler  
 Wood Waste Combustion (uncontrolled)  
 Dry Wood

Plant 2

Capacity (MMBtu/hr) 5.02

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
Emission Factor in lb/MMBtu	0.400	0.377	0.327	0.025	0.490	0.017	0.600
Potential Emissions in tons/yr	8.8	8.3	7.2	0.5	10.8	0.4	13.2

\*These emission calculations are those as determined in Part 70 Operating Permit Renewal No. 177-17509-00083, issued on February 11, 2004.

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.

\*The PM10 and PM2.5 emission factors include the condensible PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

\*\*The CO emission factor is for stokers and dutch ovens/fuel cells. Change the emission factor to 0.17 lb/MMBtu if the calculations are for a fluidized bed combustor.

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu) x 2000 lbs/1 ton

Per 326 IAC 6-2-4, PM emission rate shall be limited to: 0.60 lb/MMBtu

where,

$$Q_{total} = (5.02) \text{ MMBtu/hr}$$

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for

(Calculation note as #1 above.)

Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

\*The source has requested a VOC limit for surface coating operations of 248 tons per year. (Limit change to 245 for Part 70 Operating Permit Renewal 177-26604-00083)

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

Appendix A: HAP Emissions Calculations  
 External Combustion Boiler  
 Wood Waste Combustion (uncontrolled)  
 All Wood Waste Fuel Types

Company Name **J.M. Hutton and Co., Inc.**  
 Address City IN ZI **1117 North E Street, Richmond, IN 47375**  
 TVOP: **T177-17509-00083**  
 Reviewer: **Chrystal Wagner**  
 Date: August 27, 2003

Plant 2

Capacity (MMBtu/hr) 5.02

Hazardous Air Pollutant	Acrolein	Benzene	Formaldehyde	HCl	Styrene
Emission Factor in lb/MMBtu	4.00E-03	4.20E-03	4.40E-03	1.90E-02	1.90E-03
Potential Emissions in tons/yr	8.80E-02	9.23E-02	9.67E-02	4.18E-01	4.18E-02

**Total HAPs 0.737**

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for

Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

These factors include the five (5) HAP with the highest AP-42 emission factors.

J.M. Hutton Co.  
 1117 North E Street, Richmond, IN 47374  
 Permit Reviewer: James Mackenzie

Appendix A to TSD  
 Permit#: T 177-26604-00083  
 [initial TV calculations; 08/08/03]  
 12/18/08

**Woodworking Operations**

**Plant 2**

Woodworking Operation Equipped with Two (2) Cyclones

Sawdust Produced:	10 lb/hr
Particulate Control Efficiency:	0.85

<sup>1</sup>These emission calculations are those as determined in Part 70 Operating Permit

$$\text{PM Emissions before controls} = \frac{10.0 \text{ lb PM}}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} \times 100\% = 43.8 \text{ tons/yr}$$

$$\text{Potential PM Emissions} = \frac{43.8 \text{ tons/yr}}{(1 - 85\%)} = \mathbf{6.6 \text{ tons/yr}}$$

Note: For woodworking, potential emissions are determined after the control device.

(Calculation note as #1 above.)

\*The source has requested a VOC limit for surface coating operations of 248 tons per year. (Limit change to 245 for Part 70 Operating Permit Renewal 177-26604-00083)