



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: June 20, 2008

RE: Cameo Brands, Inc. / 043-26614-00024

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

## Notice of Decision – Approval

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

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

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

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

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

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

Enclosures  
FNPER-AM.dot12/3/07



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June 20, 2008

Mr. Ken Zack, Executive Vice President  
Cameo Brands, Inc.  
540 Central Court  
New Albany, Indiana 47150-7223

Re: **043-26614-00024**  
Part 70 Source Transitioning to  
Exempt Construction and Operation Status  
T 043-19947-00024

Dear Mr. Zack:

The application from Cameo Brands, Inc. received on June 2, 2008, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary synthetic marble bathroom fixture warehouse and distribution operation located at 540 Central Court, New Albany, Indiana, is classified as exempt from air pollution permit requirements. The source consists of the following emission unit:

One (1) mold maintenance repair operation, identified as EU#4, constructed in 1986, maximum capacity 0.8 molds per hour, and exhausting to stack identified as S-1/S-2.

The following conditions shall be applicable:

- (1) 326 IAC 5-1-2 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
  - (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 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

This exemption supersedes Part 70 Renewal No. 043-19946-00024 and its amendment 043-253218-00024. A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Janet Mobley, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-5373 or at 1-800-451-6027 (ext 4-5373).

Sincerely,

*Original document signed by*

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/jm

cc: File - Floyd County  
Floyd County Health Department  
Air Compliance Section  
IDEM Southwest Regional Office  
Compliance Data Section  
Permits Administrative and Development  
Billing, Licensing and Training Section

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Transitioning to an Exemption

#### Source Description and Location

<b>Source Name:</b>	<b>Cameo Brands, Inc.</b>
<b>Source Location:</b>	<b>540 Central Court, New Albany, IN 47150</b>
<b>County:</b>	<b>Floyd</b>
<b>SIC Code:</b>	<b>3088/3089</b>
<b>Registration (or Exemption) No.:</b>	<b>043-26614-00024</b>
<b>Permit Reviewer:</b>	<b>Janet Mobley</b>

On June 2, 2008, the Office of Air Quality (OAQ) has received an application from Cameo Brands, Inc., related to a synthetic marble bathroom fixture warehouse and distribution operation.

#### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Part 70 Renewal No. 043-19947-00024, issued on May 30, 2006.
- (b) Administrative Amendment No. 043-25318-00024, issued on October 15, 2007.

Due to this application, the source is transitioning from a Part 70 permit to an Exemption level.

#### County Attainment Status

The source is located in Floyd County.

Pollutant	Designation
SO <sub>2</sub>	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. Basic nonattainment designation effective federally 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, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Floyd County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Floyd County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

(c) Other Criteria Pollutants

Floyd County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<b>Fugitive Emissions</b>
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The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

<b>Background and Description of Emission Units and Pollution Control Equipment</b>
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On April 10, 2008, Cameo Brands, Inc., permanently ceased manufacturing operations and has disassembled or is in the process of disassembling and shipping to other out of state locations the following equipment that was previously permitted under Title V Renewal (T043-19947-00024):

- EU#1 (spray booth for spraying gel coat onto fiberglass molds)
- EU#2 (grinding and polishing booth)
- EU#3 (resin/aggregate mixing and pouring operation)
- EU#5 (mold maintenance set-up and gun cleaning operation)
- EU#6 (Calcium carbonate receiving by rail and truck; and Tank 1, (6,000 gallon polyester resin storage tank)

The facility's primary use will be as a finished products warehouse/distribution center. The only process that will remain is the mold maintenance repair (EU#4) operation. Corresponding applicable requirements for the units removed will also be deleted.

The source consists of the following existing emission unit:

One (1) mold maintenance repair operation, identified as EU#4, constructed in 1986, maximum capacity 0.8 molds per hour, and exhausting to stack id S-1/S-2.

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Exemption**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							
	PM	PM10 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
EU#4	-	-	-	-	0.46	-	-	0.27
<b>Total PTE of Entire Source</b>	-	-	-	-	<b>0.46</b>	-	-	<b>0.27</b>
Exemptions Levels	5	5	10	10	5	25	2.5	1
Registration Levels	25	25	25	25	25	100	-	-
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.								

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).

**Hazardous Air Pollutants**

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

### **Federal Rule Applicability Determination**

#### New Source Performance Standards (NSPS)

There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

The existing source was subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW) because the facility was a major source of HAPs. The gel coat and resin facilities used to manufacture nonreinforced plastics composites using thermoset resins and/or gelcoats that contain styrene have been removed so the facility is no longer subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW).

#### Compliance Assurance Monitoring (CAM)

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

### **State Rule Applicability Determination**

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)  
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings 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.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- Cameo Brands had been subject to 326 IAC 8-1-6 previously. The source had accepted limits of less than 25 tons per year of VOC emissions at the time of construction, and the requirements of 326 IAC 8-1-6 did not apply. In 2001, the source submitted an application to IDEM to increase the VOC emissions from the synthetic marble casting operation. This modification allowed the source to increase VOC emissions from the synthetic marble casting operation to greater than 25 tons per year and, therefore, the synthetic marble casting operation became subject to the requirements of 326 IAC 8-1-6, which requires the use of Best Available Control Technology (BACT). Since the changes at the facility, the unlimited VOC potential emissions from the emission unit is less than twenty-five (25) tons per year, so 326 8-1-6 no longer applies.
- (h) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

### Conclusion and Recommendation

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 June 2, 2008.

The operation of this source shall be subject to the conditions of the attached Exemption No. 043-26614-00024. The staff recommends to the Commissioner that this Exemption be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Janet Mobley at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

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

Appendix A: Emissions Calculations  
HAP and VOC Emissions from Mold Maintenance Operations

Company Name: Cameo Brands, Inc.  
Address: 540 Central Court, New Albany, Indiana 47150  
Exemption Status: 043-26614-00024  
Reviewer: Janet Mobley  
Date: June 17, 2008

Molds Repaired (hr)	Hours Per Year	VOC Emissions per Mold (lbs)	VOC Emissions (lb/hr)	Total VOC Emissions (lbs)	Total VOC Emissions (tons)
0.8	8760	0.13	0.11	929.84	<b>0.46</b>

Molds Repaired (hr)	Hours Per Year	o-Xylene Emissions per Mold (lbs)	Total o-Xylene Emissions (lbs)	Total o-Xylene Emissions (tons)	Toluene Emissions per Mold (lbs)	Total Toluene Emissions (lbs)	Total Toluene Emissions (tons)
0.8	8760	0.03	191.63	0.1	0.01	91.25	0.05

Molds Repaired (hr)	Hours Per Year	Styrene Emissions per Mold (lbs)	Total Styrene Emissions (lbs)	Total Styrene Emissions (tons)	MMA Emissions per Mold (lbs)	Total MMA Emissions (lbs)	Total MMA Emissions (tons)	Total HAP Emissions (tons)
0.8	8760	0.03	192.17	0.10	0.01	41.06	0.02	<b>0.26</b>

o-Xylene (lbs/hr)	Toluene (lbs/hr)	Styrene (lbs/hr)	MMA (lbs/hr)
0.02	0.01	0.02	0.005