



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 18, 2009

RE: A & A Manufacturing Co., Inc – Gortac Division / 127-27043-00115

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

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FN-REGIS.dot 1/2/08



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REGISTRATION OFFICE OF AIR QUALITY

A&A Manufacturing Co., Inc. - Gortrac Division
386 East State Road 2
Valparaiso, Indiana 46383

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. 127-27043-00115

Issued by:

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Issuance Date: May 18, 2009

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SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary manufacturing plant for both flexible metal and plastics parts as well as rolling metal doors for emergency vehicles.

Source Address:	386 East State Road 2, Valparaiso, IN 46383
Mailing Address:	386 East State Road 2, Valparaiso, IN 46383
General Source Phone Number:	219 879-1212
SIC Code:	3499
County Location:	Porter County
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for 1-hour ozone standard Nonattainment for PM 2.5 Attainment for all other criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) washing operation, identified as P01, with a maximum usage of 6 gallons of aqueous sealant per day (No VOC), using no control and exhausting to indoors.
- (b) One (1) paint booth, consisting of a HVLP spray gun, identified as P02, constructed in May 2002, with a maximum production rate of 80 square feet per hour of metal parts, using dry filters as control, and exhausting to stack S01.
- (c) One (1) gun cleaning station, identified as P04, constructed in May 2002, with a consumption of 3 gallons per day, using no control, and exhausting to indoors.
- (d) Two (2) cold clean units, identified as P05, constructed in October 2000, with a consumption of 1 gallons per day, using no control, and exhausting to indoors.
- (e) One (1) wipe cleaning station, identified as P06, with a consumption of 3 gallons per day, using no control, and exhausting to indoors.
- (f) One (1) welding unit, identified as P07, using no control, and exhausting inside the building.
- (g) One (1) combustion source, identified as P08, with a maximum input rate of 2.9 MMBTU/hr.
- (h) Metal forming operations consisting of following machines with no emissions:
 - (1) two (2) press machines; identified as Multipress, Piranha;

- (2) three (3) press brake machines, identified as Wysong RT, Niagara and Premier;
 - (3) two (2) punch press machines, identified as Dabkey 110 ton and Verson 300 ton; and
 - (4) one (1) Turret press machine, identified as Pullmax.
- (i) Eight (8) plastic molding operation of fiber-reinforced plastic, identified as M1-M8, with a maximum capacity of 70 pounds of resins per hour each, using no control, and exhausting inside the building.

SECTION B GENERAL CONDITIONS

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

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

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. 127-27043-00115 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), 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.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 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 registration:

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) washing operation, identified as P01, with a maximum usage of 6 gallons of aqueous sealant per day (No VOC), using no control and exhausting to indoors.
- (b) One (1) paint booth, consisting of a HVLP spray gun, identified as P02, constructed in May 2002, with a maximum production rate of 80 square feet per hour of metal parts, using dry filters as control, and exhausting to stack S01.
- (c) One (1) gun cleaning station, identified as P04, constructed in May 2002, with a consumption of 3 gallons per day, using no control, and exhausting to indoors.
- (d) Two (2) cold clean units, identified as P05, constructed in October 2000, with a consumption of 1 gallons per day, using no control, and exhausting to indoors.
- (e) One (1) wipe cleaning station, identified as P06, with a consumption of 3 gallons per day, using no control, and exhausting to indoors.
- (f) One (1) welding unit, identified as P07, using no control, and exhausting inside the building.
- (g) One (1) combustion source, identified as P08, with a maximum input rate of 2.9 MMBTU/hr.
- (h) Metal forming operations consisting of following machines with no emissions:
 - (1) two (2) press machines; identified as Multipress, Piranha;
 - (2) three (3) press brake machines, identified as Wysong RT, Niagara and Premier;
 - (3) two (2) punch press machines, identified as Dabkey 110 ton and Verson 300 ton; and
 - (4) one (1) Turret press machine, identified as Pullmax.
- (i) Eight (8) plastic molding operation of fiber-reinforced plastic, identified as M1-M8, with a maximum capacity of 70 pounds of resins per hour each, using no control, and exhausting inside the building.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

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

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, the owner or operator of the cold cleaning operations shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

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

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

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

- (a) Pursuant to 326 IAC 6-3-2(d), the particulate emissions from the paint booth shall be controlled by the dry particulate filters. These dry particulate filters shall be operated in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the owner and operator shall inspect the dry particulate filters and do either of the following no later than four (4) hours after such observation:
 - (A) Repair the dry particulate filters so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the owner or operator shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

In order to comply with the condition D.1.1(a), VOC shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to

determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1(a), the owner and operator shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in Condition D.1.1(a).
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The volume weighted average VOC content of the coatings used.
- (b) Records of all required action taken as a result of the monitoring, testing, reports and support information required by this registration shall be retained for a period of at least five (5) years from the date of action taken, report, or testing. 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 owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance and Enforcement Branch**

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	A&A Manufacturing Co., Inc. - Gortrac Division
Address:	386 East State Road 2
City:	Valparaiso, IN 46383
Phone Number:	(219) 465-1898
Registration No.:	127-27043-00115

I hereby certify that A&A Manufacturing Co., Inc. - Gortrac Division is : <input type="checkbox"/> still in operation. <input type="checkbox"/> no longer in operation.
I hereby certify that A&A Manufacturing Co., Inc. - Gortrac Division is : <input type="checkbox"/> in compliance with the requirements of Registration No. 127-27043-00115. <input type="checkbox"/> not in compliance with the requirements of Registration No. 127-27043-00115.

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

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

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name:	A&A Manufacturing Co., Inc. - Gortrac Division
Source Location:	386 East State Road 2, Valparaiso, IN 46383
County:	Porter
SIC Code:	3499
Registration No.:	R 127-27043-00115
Permit Reviewer:	Renee Traivaranon

On September 29, 2008, the Office of Air Quality (OAQ) has received an application from A&A Manufacturing Co., Inc. - Gortrac Division related to the construction and operation of new emission units and the continued operation of an existing stationary manufacturing plant for both flexible metal and plastics parts as well as rolling metal doors for emergency vehicles.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Porter County.

Pollutant	Designation
SO ₂	Cannot be classified for the area bounded on the north by Lake Michigan; on the west by the Lake County and Porter County line; on the south by I-80 and I-90; and on the east by the LaPorte County and Porter County line. The remainder of Porter County is better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Nonattainment Severe 17 effective November 15, 1990, for Porter County for the 1-hour standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

(i) 1-hour ozone standard

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. South Coast Air Quality Mgmt. Dist. v. EPA, 472 F.3d 882 (D.C. Cir., December 22, 2006), rehearing denied 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the South Coast decision as follows: Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Porter County, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(ii) 8-hour ozone standard

VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(b) PM2.5

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Porter 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 New Source Review Rule for PM2.5 promulgated on May 8th, 2008, and effective on July 15th 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

(c) Other Criteria Pollutants

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

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.5 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The source consists of the following existing emission units:

- (a) One (1) washing operation, identified as P01, with a maximum usage of 6 gallons of aqueous sealant per day (No VOC), using no control and exhausting to indoors.
- (b) One (1) paint booth, consisting of a HVLP spray gun, identified as P02, constructed in May 2002, with a maximum production rate of 80 square feet per hour of metal parts, using dry filters as control, and exhausting to stack S01.
- (c) One (1) gun cleaning station, identified as P04, constructed in May 2002, with a consumption of 3 gallons per day, using no control, and exhausting to indoors.
- (d) Two (2) cold clean units, identified as P05, constructed in October 2000, with a consumption of 1 gallons per day, using no control, and exhausting to indoors.
- (e) One (1) wipe cleaning station, identified as P06, with a consumption of 3 gallons per day, using no control, and exhausting to indoors.
- (f) One (1) welding unit, identified as P07, using no control, and exhausting inside the building.
- (g) One (1) combustion source, identified as P08, with a maximum input rate of 2.9 MMBTU/hr.
- (h) Metal forming operations consisting of the following machines with no emissions:
 - (1) two (2) press machines; identified as Multipress, Piranha;
 - (2) three (3) press brake machines, identified as Wysong RT, Niagara and Premier;
 - (3) two (2) punch press machines, identified as Dabkey 110 ton and Verson 300 ton; and
 - (4) one (1) Turret press machine, identified as Pullmax.
- (i) Eight (8) plastic molding operation of fiber-reinforced plastic, identified as M1-M8, with a maximum capacity of 70 pounds of resins per hour each, using no control, and exhausting inside the building.

Enforcement Issues

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

Emission Calculations

See Appendix A of this TSD for detailed emission calculations (Page 1 through 6 of App A of TSD)

Permit Level Determination – Registration

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.

Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 ⁽¹⁾	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Washing station (PO1)	-	-	-	-	-	-	-	-	-
Paint booth (PO2)	3.3	3.3	3.3	-	-	6.1	-	-	-
Finishing Area ⁽²⁾ (PO3)	-	-	-	-	-	-	-	-	-
Gun cleaning station (PO4)	-	-	-	-	-	3.9	-	-	1.9 (Toluene)
Cold cleaning (PO5)	-	-	-	-	-	2.4	-	-	-
Wipe cleaning (PO6)	-	-	-	-	-	0.8	-	-	-
Welding (P07)	-	-	-	-	-	-	-	-	-
Combustion (PO8)	0.02	0.1	0.1	0.01	1.3	0.1	1.1	-	0.02 (Hexane)
Molding (M1-M8)	0.07	0.07	0.07	-	-	0.4	-	-	0.01 (Styrene)
Metal Forming Operations	-	-	-	-	-	-	-	-	-
Fugitive Emissions	-	-	-	-	-	-	-	-	-
Total PTE of Entire Source	3.4	3.4	3.4	0.01	1.3	13.7	1.1	<25	<10
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10

- = negligible

⁽¹⁾ 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".

⁽²⁾ area for metals doors after painting and curing prior to being shipped.

Criteria Pollutants

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOCs are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.

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)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) 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 National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) Subpart MMMM—for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products are not included in this permit because this source is not a major source for HAPs, the single HAP and the combined HAPS is less than 10 and 25 tons per year respectively.

The National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) Subpart T—National Emission Standards for Halogenated Solvent Cleaning is not included in this permit because this source does not use the listed halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

The National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources is not included in this permit because the source does not perform paint stripping using MeCl for the removal of dried paint or perform spray application of coatings that contain the target HAP; compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), as defined 40 CFR 63.11180

Compliance Assurance Monitoring (CAM)

- (c) 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 2-5.5 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration 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 located in Porter County, it has potential to emit of NO_x and VOC of less than twenty-five (25) tons per year, 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.

Paint Booth Operation

- (g) 326 IAC 8-2-9 (Surface Coating Operation)

The requirements of 326 IAC 8-2-9 apply to the paint booth since it was constructed after July 1, 1990; and has actual VOC emissions greater than 15 pounds per day.
Pursuant to 326 IAC 8-2-9, the paint booth is subject to the following requirements:

- (a) Pursuant to 326 IAC 8-2-9(d), the owner and operator shall not discharge into the atmosphere in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, when coating metal.
- (b) Pursuant to 326 IAC 8-2-9(f), solvent sprayed from the application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (h) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The paint booth is subject to the requirements of 326 IAC 6-3, because the manufacturing process is not listed in 326 IAC 6-3-1(b) and particulate matter emission limits for the manufacturing process is not established under any other rules.

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

- (a) The particulate emissions from the Paint Booth shall be controlled by the dry particulate filters. These dry particulate filters shall be operated in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the owner and operator shall inspect the dry particulate filters and do either of the following no later than four (4) hours after such observation:
 - (A) Repair the dry particulate filters so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

Cold Clean Degreasing Operation

- (i) 326 IAC 8-3-2 (Cold Cleaner Operation)
The two (2) cold clean units, identified as P05, are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operation) since they were constructed after January 1, 1980 and used organic solvent for the degreasing operations.

Pursuant to 326 IAC 8-3-2, the owner or operator of a cold cleaning facility shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;

- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Plastic Molding Operation

- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the molding machine is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each molding machine is less than twenty-five (25) tons per year.

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 and additional information for the purposes of this review was received on September 30, 2009, October 13, 2008, November 19, 2008, January 6, 2009 and February 27, 2009.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. 127-27043-00115. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Renee Traivaranon 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) 234-5615 or toll free at 1-800-451-6027 extension 4-5615.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Calculations**Paint booth****Company Name: A&A Manufacturing Co., Inc. - Gortrac Division****Address City IN Zip: 386 East State Road 2, Valparaiso, IN 46383****Permit Number: R 127-27043-00115****Permit Reviewer: Renee Traivaranon****Date: May 8, 2009**

Material	Density (Lb/Gal) ⁽¹⁾	Weight % Volatile (H2O & Organics) ⁽¹⁾	Weight % Water	Weight % Organics ⁽¹⁾	Volume % Water	Volume % Non-Volatiles (solids) ⁽¹⁾	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
paintbooth (PO2)	8.3	43.80%	0.0%	41.8%	0.0%	51.35%	0.005	80	3.47	3.47	1.4	33.3	6.1	3.3	6.8	60%

METHODOLOGYNote: ⁽¹⁾ information is from PI-19 date October 13, 2008

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)

**Appendix A: Emission Calculations
Cleaning Stations**

Company Name: A&A Manufacturing Co., Inc. - Gortrac Division
Address City IN Zip: 386 East State Road 2, Valparaiso, IN 46383
Permit Number: R 127-27043-00115
Permit Reviewer: Renee Traivaranon
Date: May 8, 2009

Material	Density (Lb/Gal)	Material Usage* (gal/yr)	Gallons of Material (gal/hour)	Weight % VOC	Weight % Toluene	Weight % MIBK	VOC (ton/yr)	Toluene (ton/yr)	MIBK (ton/yr)
Cold Cleaning Solution (PO5)	6.55	--	0.085	100%	--	--	2.44	--	--
Gun Cleaning Solution (PO4)	6.96	510	0.128	100%	50.00%	10.00%	3.89	1.94	0.39
Wiping Solution (PO6)	6.68	112	0.028	100%	--	--	0.82	--	--

METHODOLOGY

* Actual usage at 4000 hours/year, as provided by the source.

(usage and actual operations were provided by the source)

PTE based on the methodology that all VOC is emitted.

Gallons of Material (gal/hr) = gallons of material (gal/yr)/4000 hrs/yr

PTE VOC (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * 8760 hrs/yr * 1 ton/2000 lbs

PTE HAP (Toluene or MIBK) (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

Company Name: A&A Manufacturing Co., Inc. - Gortrac Division
Address City IN Zip: 386 East State Road 2, Valparaiso, IN 46383
Permit Number: R 127-27043-00115
Reviewer: Renee Traivaranon
Date: May 8, 2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.9

25.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.3	0.1	1.1

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

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

HAPs Emissions

Company Name: A&A Manufacturing Co., Inc. - Gortrac Division
Address City IN Zip: 386 East State Road 2, Valparaiso, IN 46383
Permit Number: R 127-27043-00115
Reviewer: Renee Traivaranon
Date: May 8, 2009

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.667E-05	1.524E-05	9.527E-04	2.286E-02	4.319E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.351E-06	1.397E-05	1.778E-05	4.827E-06	2.667E-05

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.

**Appendix A: Emission Calculations
Molding Machines (M1-M8)**

Company Name: A&A Manufacturing Co., Inc. - Gortrac Division
Address City IN Zip: 386 East State Road 2, Valparaiso, IN 46383
Permit Number: R 127-27043-00115
Permit Reviewer: Renee Traivaranon
Date: May 8, 2009

Material	Pounds of Material (Lb/hr)	Numbers of Units (units)	Total Maximum (lbs/hour)	Pollutans	Emissions Factor lb/MMlb	PTE (ton/yr)
Polyamide 6/fiber	70.0	8.0	560.0	VOC	171.0	0.42
Polyamide 6/fiber	70.0	8.0	560.0	PM	27.0	0.07
Polyamide 6/fiber	70.0	8.0	560.0	CO	12.0	0.03
Polyamide 6/fiber	70.0	8.0	560.0	NOx	0.0	2.5E-05
Polyamide 6/fiber	70.0	8.0	560.0	Styrene	2.9	0.01

Methodology:

PTE (ton per yr) = Maximum Process Weight (pounds/hr) * emission factor (lb/1000000lb)*8760 hr/yr * ton/2000 lb

This "Development of Emission Factors for Polyamide Processing", Journal of the Air & Waste Mangement Association, Table 3, Page 1008, Volum 51, July 2001 was provided by the souce. IDEM upon evaluation of this document chose the emission factors most representative of the plastic used by the source.

**Appendix A: Emission Calculations
Summary**

Company Name: A&A Manufacturing Co., Inc. - Gortrac Division
Address City IN Zip: 386 East State Road 2, Valparaiso, IN 46383
Permit Number: R 127-27043-00115
Permit Reviewer: Renee Traivaranon
Date: May 8, 2009

Emission Units	PM	PM10/PM2.5	SO ₂	NO _x	VOC	CO	HAPs
Painting (P02)	3.3	3.3	-	-	6.1	-	-
Gun Cleaning (P04)	-	-	-	-	3.9	-	1.94(toluene)
Cold Cleaning (P05)	-	-	-	-	2.4	-	-
Wipe Cleaning (P06)	-	-	-	-	0.8	-	-
Heating (P08)	0.02	0.10	0.01	1.3	0.07	1.1	0.02 (Hexane)
Molding (M1-M8)	0.07	0.07	-	-	0.4	-	0.01 (styrene)
TOTALS	3.4	3.4	0.01	1.3	13.7	1.1	<25



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Keith Powell
A & A Manufacturing Company
386 E SR 2
Valparaiso, Indiana 46383

DATE: May 18, 2009

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

SUBJECT: Final Decision
Registration
127-27043-00115

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

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3		Porter County Board of Commissioners 155 Indiana Ave Valparaiso IN 46383 (Local Official)										
4		Porter County Health Department 155 Indiana Ave, Suite 104 Valparaiso IN 46383-5502 (Health Department)										
5		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
6		Mr. Ed Dybel 2440 Schrage Avenue Whiting IN 46394 (Affected Party)										
7		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
8		Mr. Dee Morse National Park Service 12795 W Alameda Pky, P.O. Box 25287 Denver CO 80225-0287 (Affected Party)										
9		Valparaiso City Council and Mayors Office 166 Lincolnway Valparaiso IN 46383-5524 (Local Official)										
10		Mr. Joseph Virgil 128 Kinsale Avenue Valparaiso IN 46385 (Affected Party)										
11		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)										
12		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
13		Eric & Sharon Haussman 57 Shore Drive Ogden Dunes IN 46368 (Affected Party)										
14		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
15		Mrs. JoAnna Perdsock RMT, Inc. 150 N Patrick Blvd., Ste 180 Brookfield WI 53045-5854 (Consultant)										

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