



# 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: Sept. 18, 2009

RE: D & W, Inc. / 039-28137-00195

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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## Minor Source Operating Permit OFFICE OF AIR QUALITY

**D & W, Inc.**  
**941 Oak St.**  
**Elkhart, Indiana 46514**

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

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

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

Operation Permit No.: M039-28137-00195	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Sept. 18, 2009 Expiration Date: Sept. 18, 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary mirror glass coating source.

Source Address:	941 Oak St., Elkhart, Indiana 46514
Mailing Address:	941 Oak St., Elkhart, Indiana 46514
General Source Phone Number:	574-264-9674
SIC Code:	3231
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) glass coating line, identified as GC1, constructed in 1986, with a maximum capacity of two thousand five hundred fifty (2550) square feet of glass per hour, equipped with flow coating applicators, uncontrolled and exhausting through Stack GC1.
- (b) One (1) electric drying oven, identified as EDO 1, constructed in 1986, with a maximum capacity of two thousand five hundred fifty (2550) square feet of glass per hour, uncontrolled and exhausting inside the building.
- (c) One (1) cold cleaner degreaser, identified as Cold Cleaner, with a maximum usage rate of five hundred forty-eight ten-thousandths (0.0548) gallons of solvent per day, uncontrolled and exhausting inside the building. (326 IAC 8-3-2) (326 IAC 8-3-5)
- (d) One (1) wood cutting and crating operation, identified as Wood Crating 1, constructed in 1986, with a maximum capacity of six hundred (600) pounds of wood per hour, equipped with a fabric filter and exhausting inside the building.
- (e) One (1) natural gas-fired boiler, identified as Boiler, constructed in 1986, with a maximum heat input capacity of one and twenty-three hundredths (1.23) million British thermal units per hour, uncontrolled and exhausting through Stack SV-1. (326 IAC 6-2-4)
- (f) Thirty (30) natural gas-fired space heaters, identified as Space 2 through Space 31, constructed in 1986, with a maximum heat input capacity of one hundred thousandths (0.100) million British thermal units per hour, each, uncontrolled and exhausting through Stacks SV-2 to SV-31.
- (g) Six (6) natural gas-fired space heaters, identified as Space 32 to Space 37, constructed in 1986, with a maximum heat input capacity of one hundred twenty-five thousandths

- (0.125) million British thermal units per hour, each, uncontrolled and exhausting through Stacks SV-32 to SV-37.
- (h) Three (3) natural gas-fired space heaters, identified as Space 38 to Space 40, constructed in 1986, with a maximum heat input capacity of ninety thousandths (0.090) million British thermal units per hour, each, uncontrolled and exhausting through Stacks SV-38 to SV-40.
- (i) Two (2) natural gas-fired space heaters, identified as Space 41 to Space 42, constructed in 1986, with a maximum heat input capacity of two hundred twenty-five thousandths (0.225) million British thermal units per hour, each, uncontrolled and exhausting through Stacks SV-41 to SV-42.

## **SECTION B GENERAL CONDITIONS**

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

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

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

(a) This permit, M039-28137-00195, 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, until the renewal permit has been issued or denied.

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

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

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

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

### **B.4 Enforceability**

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

### **B.5 Severability**

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

### **B.6 Property Rights or Exclusive Privilege**

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

### **B.7 Duty to Provide Information**

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

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

## B.8 Certification

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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 an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance 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.10 Preventive Maintenance Plan [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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) All terms and conditions of permits established prior to M039-28137-00195 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.15 Source Modification Requirement**

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

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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- (a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (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.19 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

#### **C.8 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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 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 2-6.1-5(a)(2)]**

#### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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

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

**C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11]**

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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**

**C.13 Response to Excursions or Exceedances**

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

- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.15 Malfunctions Report [326 IAC 1-6-2]**

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]: Surface Coating Operations

- (a) One (1) glass coating line, identified as GC1, constructed in 1986, with a maximum capacity of two thousand five hundred fifty (2550) square feet of glass per hour, equipped with flow coating applicators, uncontrolled and exhausting through Stack GC1.
- (b) One (1) electric drying oven, identified as EDO 1, constructed in 1986, with a maximum capacity of two thousand five hundred fifty (2550) square feet of glass per hour, uncontrolled and exhausting inside the building.

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

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

#### D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-1-6]

Pursuant to CP 039-3161-00195, issued on October 6, 1994, and in order to comply with the requirements of 326 IAC 8-1-6 (BACT), the Permittee shall comply with the following:

- (a) The one (1) glass coating line, identified as GC1, shall utilize flow coating as the application method at all times, and
- (b) The amount of VOC delivered to the flow coating applicators, including clean-up solvents, shall not exceed eighty (80.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits shall satisfy the requirements of 326 IAC 8-1-6 (BACT).

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the glass coating line, identified as GC1.

### Compliance Determination Requirements

#### D.1.3 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.1.1 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 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limits and the HAP content and usage limits established in Condition D.1.1(b).
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water 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 solvents.
- (3) The cleanup solvent usage for each month.
- (4) The total VOC usage for each month.
- (4) The total weight of VOCs emitted for each compliance period.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.5 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.1(b) shall be submitted to the addresses 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 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]: Degreasing Operations

- (c) One (1) cold cleaner degreaser, identified as Cold Cleaner, with a maximum usage rate of five hundred forty-eight ten-thousandths (0.0548) gallons of solvent per day, uncontrolled and exhausting inside the building. (326 IAC 8-3-2) (326 IAC 8-3-5)

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

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee 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.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall continue to ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under

the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall continue to ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1): Wood Cutting and Crating Operations

- (d) One (1) wood cutting and crating operation, identified as Wood Crating 1, constructed in 1986, with a maximum capacity of six hundred (600) pounds of wood per hour, equipped with a fabric filter and exhausting inside the building.

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

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

#### D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to § 6-3-2(e), the particulate matter (PM) from the wood cutting and crating operation, identified as Wood Crating 1, shall still not exceed one and eighty-three hundredths (1.83) pounds per hour when operating at a process weight rate of thirty hundredths (0.30) tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

#### D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the wood cutting and crating operation, identified as Wood Crating 1.

### Compliance Determination Requirements

#### D.3.3 Particulate Control

In order to comply with Condition D.3.1, the fabric filter for particulate control shall be in operation and control emissions, from the wood cutting and crating operation, at all times the wood cutting and crating equipment is in operation.

## SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1): Natural Gas Combustion

- (e) One (1) natural gas-fired boiler, identified as Boiler, constructed in 1986, with a maximum heat input capacity of one and twenty-three hundredths (1.23) million British thermal units per hour, uncontrolled and exhausting through Stack SV-1. (326 IAC 6-2-4)

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

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

#### D.4.1 Particulate [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Limitations for Sources of Indirect Heating), the PM emissions from the one (1) natural gas-fired boiler, identified as Boiler, constructed in 1986, rated at one and twenty-three hundredths (1.23) million British thermal units per hour, shall not exceed six tenths (0.6) pound per million British thermal units.

This limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

Where:

- Pt = Allowable Particulate Emission Limitation in pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

However, pursuant to 326 IAC 6-2-4(a), for Q less than ten (10) mmBtu/hr, Pt shall not exceed six tenths (0.6) mmBtu.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: D & W, Inc.  
Source Address: 941 Oak St., Elkhart, Indiana 46514  
Mailing Address: 941 Oak St., Elkhart, Indiana 46514  
MSOP No.: M039-28137-00195

**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:

Date:



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### COMPLIANCE AND ENFORCEMENT BRANCH

### Quarterly Report

Source Name: D & W, Inc.  
Source Address: 941 Oak Street, Elkhart, Indiana 46514  
Mailing Address: 941 Oak Street, Elkhart, Indiana 46514  
Permit No.: M 039-28137-00195  
Facility: Glass Coating Line, GC1  
Parameter: VOCs  
Limit: Less than eighty (80.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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.**

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Transitioning to a Minor Source Operating Permit (MSOP)

### Source Description and Location

**Source Name:** D & W, Inc.  
**Source Location:** 941 Oak St. Elkhart, Indiana 46514  
**County:** Elkhart  
**SIC Code:** 3231  
**Operation Permit No.:** 039-28137-00195  
**Permit Reviewer:** Hannah L. Desrosiers

On June 23, 2009, the Office of Air Quality (OAQ) received an application from D & W, Inc. related to the transition of a FESOP to a MSOP. The requested transition was accomplished as follows:

- (a) The source has notified IDEM that they have changed their existing flow coating applicator, used in glass coating line GC1, to a newer more efficient model, resulting in reduced paint and solvent usage for that emission unit.
- (b) The source has also informed IDEM of a change in the coatings used in glass coating line GC1, to ones having a lower VOC content per coating.

Each of the above listed changes, reduces emissions from the flow coating operations, and are considered notice-only changes. The combined changes result in less material applied per part being coated, with lower VOC content per coating, for an overall reduction in VOCs to less than the TV Major Source Thresholds. Therefore, the transition from FESOP to MSOP is supported.

### Existing Approvals

The source has been operating under FESOP No. F 039-20619-00195, issued on June 01, 2005.

Due to this application, the source is transitioning from a FESOP to a MSOP.

### County Attainment Status

The source is located in Elkhart County. The following attainment status designations are applicable to Elkhart County:

Pollutant	Designation
PM10	Unclassifiable effective November 15, 1990.
PM2.5	Unclassifiable or attainment effective April 5, 2005
SO2	Better than national standards.
NO2	Cannot be classified or better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
Pb	Not designated.

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour standard was revoked effective June 15, 2005.

- (a) **Ozone Standards**  
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. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**  
Elkhart County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 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 PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**  
Elkhart 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.

#### **Fugitive Emissions**

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### **Background and Description of Permitted Emission Units**

The Office of Air Quality (OAQ) has reviewed an application, submitted by D & W, Inc. on June 23, 2009 relating to a transition from their Federally Enforceable State Operating Permit (FESOP), issued on June 01, 2005, to a Minor Source Operating Permit (MSOP).

The source consists of the following permitted emission unit(s):

- (a) One (1) glass coating line, identified as GC1, constructed in 1986, with a maximum capacity of two thousand five hundred fifty (2550) square feet of glass per hour, equipped with flow coating applicators, uncontrolled and exhausting through Stack GC1.
- (b) One (1) electric drying oven, identified as EDO 1, constructed in 1986, with a maximum capacity of two thousand five hundred fifty (2550) square feet of glass per hour, uncontrolled and exhausting inside the building.
- (c) One (1) cold cleaner degreaser, identified as Cold Cleaner, with a maximum usage rate of five hundred forty-eight ten-thousandths (0.0548) gallons of solvent per day, uncontrolled and exhausting inside the building. (326 IAC 8-3-2) (326 IAC 8-3-5)
- (d) One (1) wood cutting and crating operation, identified as Wood Crating 1, constructed in 1986, with a maximum capacity of six hundred (600) pounds of wood per hour, equipped with a fabric filter and exhausting inside the building.

- (e) One (1) natural gas-fired boiler, identified as Boiler, constructed in 1986, with a maximum heat input capacity of one and twenty-three hundredths (1.23) million British thermal units per hour, uncontrolled and exhausting through Stack SV-1. (326 IAC 6-2-4)
- (f) Thirty (30) natural gas-fired space heaters, identified as Space 2 through Space 31, constructed in 1986, with a maximum heat input capacity of one hundred thousandths (0.100) million British thermal units per hour, each, uncontrolled and exhausting through Stacks SV-2 to SV-31.
- (g) Six (6) natural gas-fired space heaters, identified as Space 32 to Space 37, constructed in 1986, with a maximum heat input capacity of one hundred twenty-five thousandths (0.125) million British thermal units per hour, each, uncontrolled and exhausting through Stacks SV-32 to SV-37.
- (h) Three (3) natural gas-fired space heaters, identified as Space 38 to Space 40, constructed in 1986, with a maximum heat input capacity of ninety thousandths (0.090) million British thermal units per hour, each, uncontrolled and exhausting through Stacks SV-38 to SV-40.
- (i) Two (2) natural gas-fired space heaters, identified as Space 41 to Space 42, constructed in 1986, with a maximum heat input capacity of two hundred twenty-five thousandths (0.225) million British thermal units per hour, each, uncontrolled and exhausting through Stacks SV-41 to SV-42.

#### Enforcement Issues

There are no pending enforcement actions related to this source.

#### Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

- (1) In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

#### Permit Level Determination – MSOP

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.

Pollutant	Potential To Emit (tons/year)
PM	1.87
PM10 *	2.02
PM2.5	2.02
SO <sub>2</sub>	0.01
NO <sub>x</sub>	2.50
VOC	97.67
CO	2.10

\* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (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 VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

HAPs	Potential To Emit (tons/year)
Benzene	negl.
Dichlorobenzene	negl.
Ethyl Benzene	negl.
Formaldehyde	0.002
Hexane	0.04
Toluene	negl.
Xylenes	negl.

HAPs	Potential To Emit (tons/year)
Cadmium	negl.
Chromium	negl.
Lead	negl.
Manganese	negl.
Nickel	negl.
<b>TOTAL HAPs</b>	<b>0.05</b>

Note: negl. = negligible

- (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.

**PTE of the Entire Source After Issuance of the MSOP**

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Glass Coating Line (GC1)	negl. <sup>(1)</sup>	negl. <sup>(1)</sup>	negl. <sup>(1)</sup>	0	0	80.00 <sup>(2)</sup>	0	negl. <sup>(3)</sup>	negl. <sup>(3)</sup> Lead
Degreasing	0	0	0	0	0	0.07	0	0 <sup>(4)</sup>	0 <sup>(4)</sup>
Wood Crafting 1	1.83	1.83	1.83	0	0	0	0	0	0
Natural Gas Combustion (mult. units)	0.05	0.19	0.19	0.01	2.50	0.14	2.10	0.05	0.04 (hexane)
<b>Total PTE of the Entire Source</b>	<b>1.87</b>	<b>2.01</b>	<b>2.01</b>	<b>0.01</b>	<b>2.50</b>	<b>73.18</b>	<b>2.10</b>	<b>0.05</b>	<b>0.04 (hexane)</b>

Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible

Total PTE based on rated capacity at 8,760 hours/year.

\* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (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.

(1) Coating is applied using flow coating application methods. Particulate emissions from the flow coating operation have been determined negligible, and are exempt from 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) pursuant to 326 IAC 6-3-(b)(7).

(2) The PTE VOC Limit specified above is based on the results of the BACT determination conducted for CP 039-3161-00195, issued on October 6, 1994. See State Rule applicability for details.

(3) Lead Compound Emissions relating to Surface Coating Operations are particulate in nature. The coating used by this source is applied using flow coating methods and PM emissions are considered negligible. Therefore, lead emissions are also considered negligible.

(4) MSDSs, submitted by the source, show the degreasers/cleaners to be HAP free.

(a) BACT Limit

Pursuant to CP 039-3161-00195, issued on October 6, 1994, and in order to comply with the requirements of 326 IAC 8-1-6 (BACT), the source shall continue to comply with the following:

- (A) The one (1) glass coating line, identified as GC1, shall utilize flow coating as the application method at all times, and
- (B) The amount of VOC delivered to the flow coating applicators, including clean-up solvents, shall not exceed eighty (80.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits shall continue to limit the potential to emit of VOCs to less than 100 tons per year, shall continue to satisfy the requirements of 326 IAC 8-1-6 (BACT), and shall continue to render 326 IAC 2-7 (Part 70 Permits) and 236 IAC 2-2 (PSD) not applicable.

<b>Federal Rule Applicability Determination</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in this permit, because the one (1) boiler, identified as Boiler, rated at one and twenty-three hundredths (1.23) million British thermal units per hour, has a maximum design heat input capacity of less than the applicability threshold of ten (10) million British thermal units per hour.
- (b) There are no New Source Performance Standards (NSPS) (40 CFR Part 60, 326 IAC 12) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included for the cold cleaner degreaser, since this operation still does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing (326 IAC 20-14-1), are not included for the wood cutting and crating operation, because this source is still not a major source of HAPs, as defined in 40 CFR 63.2, and still does not manufacture wood furniture or wood furniture components.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20), are not included for the wood cutting and crating operations, because this source is still not a major source of HAPs, as defined in 40 CFR 63.2, and still does not apply coatings to any wood building products. The source constructs unfinished wooden crates for shipping finished product (glass mirrors), only.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (326 IAC 20), are not included for the glass coating operation (GC1), because although this source is an area source of hazardous air pollutant (HAP) emissions, as defined in 40 CFR 63.11170(b), this source does not perform paint stripping, use spray application methods, coat metal or plastic parts, or use coatings containing any of the metal HAPs (cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni)) regulated by the rule.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Glass Manufacturing Area Sources, 40 CFR 63, Subpart SSSSSS (326 IAC 20), are not included for

the glass coating operations, because although this source is an area source of hazardous air pollutant (HAP) emissions, as defined in 40 CFR 63.11170(b), the source does not operate a glass manufacturing facility, as defined in §63.11448(a).

- (f) 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.

#### Compliance Assurance Monitoring (CAM)

- (a) 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**

#### Entire Source

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than two hundred fifty (250) tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-3 (Emission Offset)  
Elkhart County has been re-classified as attainment/unclassifiable in Indiana for the 8-hour ozone standard, effective July 19, 2007, and remains attainment or unclassifiable for all other criteria pollutants. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply to this existing source, and the requirements are not included in this permit.
- (d) 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.
- (e) 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 five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 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.

- (g) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

### Surface Coating Operations

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
The existing glass coating line, identified as GC1, continues to use flow coating to apply coating materials to glass mirrors. Therefore, since surface coating operations using flow coating are specifically exempted from the rule, 326 IAC 6-3-1(b)(7), the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) still do not apply to the glass coating operations at this source, and are not included in this permit.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements)
  - (1) The initial determination conducted in 1994, CP 039-3161-00195 issued on October 6, 1994, for the one (1) glass coating line, constructed in 1986 and identified as GC1, indicated that the potential to emit VOC was greater than twenty-five (25) tons per year. Additionally, the unit was not regulated by any other requirement in Article 8. Therefore, VOC emissions from the one (1) glass coating line were determined subject to the requirements of 326 IAC 8-1-6 BACT (Best Available Control Technology), as follows:
    - (A) Pursuant to Condition #4 of CP 039-3161-00195, issued on October 6, 1994, BACT for the one (1) glass coating line was determined to be the utilization of flow coating as the application method at all times. The BACT analysis used eighty (80.0) tons per year as the baseline.
    - (B) Pursuant to Condition #5 of CP 039-3161-00195, issued on October 6 1994, in order to comply with Condition #4 of the same permit, and the requirements of 326 IAC 8-1-6, the amount of VOC delivered to the applicators, including clean-up solvents, were not to exceed eighty (80.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
  - (2) In 2002, D & W, Inc. reduced their potential VOC emissions from ninety seven and five tenths (97.5) tons per year, CP 039-3161-00195, to a potential to emit VOC of seventy three and four tenths (73.4) tons per year with an increased capacity of three thousand (3,000) square feet per hour, MSOP 039-16297-00195, issued on November 27, 2002. Pursuant to 326 IAC 8-1-1(a) (Applicability), once a facility becomes subject to a rule within Article 8, under any rule applicability section in the article, such facility shall remain subject to such rule notwithstanding any subsequent decrease in VOC emissions unless specifically exempted by the commissioner according to the provisions of subsection (b) under the provision. Therefore, the eighty (80.0) tons per year VOC limit, from the BACT requirements contained in CP 039-3161-00195, issued on October 6 1994, was retained for the one (1) glass coating line, GC1, in the new MSOP .
  - (3) In 2005, D & W, Inc. increased their potential VOC emissions from 73.4 tons per year, MSOP 039-16297-00195, to one hundred thirty and eight tenths (130.8) tons per year with a decrease in capacity from three thousand (3,000) to two thousand five hundred fifty (2,550) square feet per hour, FESOP 039-20619-00195, issued June 1, 2005. Pursuant to IDEM's previous determination, and the requirements of 326 IAC 8-1-1(a), the 326 IAC 8-1-6 BACT limit still applied to the existing glass coating line, identified as GC1. Therefore, the eighty (80.0) tons per year VOC limit, from the BACT requirements contained in CP 039-3161-00195, was retained for the one (1) glass coating line, GC1, in the new FESOP.

- (4) With this application, D & W, Inc. has demonstrated a reduction in their potential VOC emissions from one hundred thirty and eight tenths (130.8) tons per year, FESOP 039-20619-00195, to a potential to emit VOC of ninety-seven and sixty-seven hundredths (97.67) tons per year with the replacement of their existing flow coating applicator to a new more efficient flow coating applicator, of the same type, and a change in coatings to ones with lower VOC content per coating. However, pursuant to 326 IAC 8-1-1(a), the requirements of 326 IAC 8-1-6 BACT still apply to the existing glass coating line, GC1, and the VOC limit of eighty (80.0) tons per year, and the BACT requirements established in CP 039-3161-00195, issued on October 6, 1994, will be retained in this MSOP.

See Appendix A for the detailed calculations.

- (c) There are no other 326 IAC 8 Rules that apply to the surface coating operations at this source.

#### Degreasing Operations

- (a) 326 IAC 8-3-2 (Cold Cleaner Operations)

The one (1) insignificant cold cleaner degreaser, identified as Cold Cleaner, is subject to the provisions of 326 IAC 8-3-2 (Organic solvent degreasing operations: cold cleaner operations). Therefore, pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee 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.

- (b) 326 IAC 8-3-5 (Organic Solvent Degreasing Operations)

The one (1) insignificant cold cleaner degreaser, identified as Cold Cleaner, is also subject to the provisions of 326 IAC 8-3-5 (Organic solvent degreasing operations: cold cleaner degreaser operation and control) because it was constructed in 2000 and does not have a remote solvent reservoir. Therefore, pursuant to 326 IAC 8-3-5, the Permittee shall continue to:

- (1) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall continue to ensure that the following control equipment requirements are met:
  - (A) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (i) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (ii) The solvent is agitated; or
    - (iii) The solvent is heated.

- (B) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (C) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (D) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (E) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (ii) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (iii) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (2) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall continue to ensure that the following operating requirements are met:
- (A) Close the cover whenever articles are not being handled in the degreaser.
  - (B) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (C) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (c) There are no other 326 IAC 8 Rules that apply to solvent usage at this source

#### Wood Cutting and Crating Operation

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to § 6-3-2(e), the particulate matter (PM) from the wood cutting and crating operation, identified as Wood Crating 1, shall still not exceed one and eighty-three hundredths (1.83) pounds per hour when operating at a process weight rate of thirty hundredths (0.30) tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

Based on Appendix A, the potential PM emission rate for the wood cutting and crating operation, after controls, is:

$$1.83 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = \mathbf{0.417 \text{ lb/hr}}$$

The controlled potential PM emissions from the wood cutting and crating operation are four hundred seventeen thousandths (0.417) pounds of PM per hour, which is less than the allowable emissions of one and eighty-three hundredths (1.83) pounds of PM per hour. Therefore, the wood cutting and crating operation continues to comply with this rule.

The fabric filter(s) shall continue to be in operation at all times, that Wood Crating 1 is in operation, in order to continue to comply with this limit.

See Appendix A for the detailed calculations.

#### Natural Gas Combustion

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

The one (1) natural gas-fired boiler and the forty-one (41) natural gas-fired space heaters are each not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, 326 IAC 4-2-2 does not apply to the one (1) natural gas-fired boiler, and forty-one (41) natural gas-fired space heaters, and the requirements are not included in the permit.

(b) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

(1) The one (1), existing, natural gas-fired boiler, identified as Boiler, constructed in 1986, after the rule applicability date of September 21, 1983, must continue to comply with the requirements of 326 IAC 6-2-4, as follows:

The emission limitations for this unit, as provided in 326 IAC 6-2-4, are based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units 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.

The heat input capacity of the one (1) natural gas-fired boiler is one and twenty-three hundredths (1.23) million British thermal units per hour. There were no boilers in operation at the source when this boiler was constructed. Therefore;

$$Pt = 1.09/(1.23)^{0.26} = 1.03 \text{ lb/MMBtu heat input}$$

Pursuant to 326 IAC 6-2-4(a), for Q less than ten (10) mmBtu/hr, Pt shall still not exceed six tenths (0.6) mmBtu. Therefore, the particulate matter emissions from the boiler shall continue to not exceed six tenths (0.6) pounds per mmBtu heat input.

Based on Appendix A, and AP-42, the potential PM emission rate is still one and ninety hundredths (1.90) pounds per million cubic feet of natural gas, or nineteen ten-thousandths (0.0019) pounds per million British thermal units. Therefore, the one (1) boiler is still in compliance with this rule.

- (2) The forty-one (41) natural gas-fired space heaters are each not sources of indirect heating, as defined in 326 IAC 1-2-19 "Combustion for indirect heating". Therefore, 326 IAC 6-2-2 does not apply to the forty-one (41) natural gas-fired space heaters, and the requirements are not included in the permit.
- (c) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
 The one (1) natural gas-fired boiler and the forty-one (41) natural gas-fired space heaters, each, do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2), and are therefore each exempt from the requirements of 326 IAC 6-3. Consequently, the requirements of 326 IAC 6-3 are not included in the permit for these units.
- (d) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)  
 The potential, and actual, emissions emissions from the one (1) natural gas-fired boiler and the forty-one (41) natural gas-fired space heaters, each, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, 326 IAC 7-1.1-2 does not apply to the one (1) natural gas-fired boiler and the forty-one (41) natural gas-fired space heaters, and the requirements are not included in the permit.
- (e) 326 IAC 9-1 (Carbon Monoxide Emission Limits)  
 There are no applicable emission limits listed in 326 IAC 9-1-2 for any of the facilities at this source. Therefore, 326 IAC 9-1 does not apply to the one (1) natural gas-fired boiler and the forty-one (41) natural gas-fired space heaters, and the requirements are not included in the permit.
- (f) 326 IAC 10-1-1 (Nitrogen Oxides Control)  
 This source is not located in Clark or Floyd County. Therefore, 326 IAC 10-1-1 does not apply to the one (1) natural gas-fired boiler and the forty-one (41) natural gas-fired space heaters, and the requirements are not included in the permit.

**Compliance Determination, Monitoring, Testing, Recordkeeping, and Reporting Requirements**

Compliance Determination

- (a) The glass coating operations, GC1, continue to have applicable compliance determination conditions as specified below:

Emission Unit/Control	Operating Parameters	Method
glass coating operations, GC1	VOC content	Preparing or obtaining the "as supplied" and "as applied" VOC data sheets
		Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4 as required by IDEM.

- (1) Confirmation of the VOC content of the coatings used in the glass coating operation is still required to determine compliance with the provisions of 326 IAC 8-1-6 (BACT).

- (b) The fabric filter(s), controlling particulate emissions in the wood cutting and crating operation, identified as Wood Crating 1, shall be in operation and control emissions from the wood cutting and crating equipment at all times that Wood Crating 1 is in operation.

#### Compliance Monitoring Requirements

- (a) There continue to be no compliance monitoring requirements for the glass coating line, the wood cutting and crating operation, the boiler, or any of the natural gas-fired space heaters.

#### Testing requirements

- (a) There continue to be no specific testing requirements associated with the glass coating line, the wood cutting and crating operation, the boiler, or any of the natural gas-fired space heaters.

#### Recordkeeping and Reporting Requirements

- (a) The Permittee shall continue to maintain records of material and solvent usage, and VOC content, usage, and emissions in order demonstrate compliance with the 326 IAC 8-1-6 BACT VOC emission limits established for the glass coating line;
- (b) The Permittee shall continue to submit a quarterly summary of the VOC emissions.
- (c) The Permittee shall continue to maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan as required for the surface coating and woodworking area.

<b>Conclusion and Recommendation</b>
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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 23, 2009.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 039-28137-00195. The staff recommends to the Commissioner that this MSOP be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 234-5374 or toll free at 1-800-451-6027, extension 45374.
- (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**  
**Emission Summary**

**Company Name:** D & W, Inc.  
**Address City IN Zip:** 941 Oak St. Elkhart, Indiana 46514  
**Permit No.:** 039-28137-00195  
**Reviewer:** Hannah L. Desrosiers  
**Date Submitted:** June 23, 2009

Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)							
Category	Emissions Generating Activity						
	Pollutant	Existing Emission Units				Revised Unit	TOTAL
		Coating Line * (GC1)	Degreasing	Wood Crating 1	Natural Gas Combustion (mult units)	Coating Line * (GC1)	
Criteria Pollutants	PM	0.00	0	1.83	0.05	0.00	1.87
	PM10/PM2.5	0.00	0	1.83	0.19	0.00	2.02
	SO2	0	0	0	0.01	0	0.01
	NOx	0	0	0	2.50	0	2.50
	VOC	130.79	0.07	0	0.14	97.46	97.67
	CO	0	0	0	2.10	0	2.10
Hazardous Air Pollutants	Benzene	0	0	0	5.24E-05	0	5.24E-05
	Dichlorobenzene	0	0	0	3.00E-05	0	3.00E-05
	Ethyl Benzene	3.81	0	0	0	0	0
	Formaldehyde	0	0	0	1.87E-03	0	0.002
	Hexane	0	0	0	0.04	0	0.04
	Toluene	0	0	0	8.49E-05	0	8.49E-05
	Xylenes	2.54	0	0	0	0	0
	Cadmium	0	0	0	2.75E-05	0	2.75E-05
	Chromium	0	0	0	3.50E-05	0	3.50E-05
	Lead	0	0	0	1.25E-05	0.00	8.43E-05
	Manganese	0	0	0	9.49E-06	0	9.49E-06
	Nickel	0	0	0	5.24E-05	0	5.24E-05
	<b>Totals</b>	<b>6.346</b>	<b>0</b>	<b>0</b>	<b>0.047</b>	<b>0</b>	<b>0.05</b>
							<b>0.04</b>

Total emissions based on rated capacity at 8,760 hours/year.

\* Emissions for the existing coating line (GC1) are documented in this table but have been superseded by the revised values and are therefore not included in the TOTAL emissions.

**Appendix A: Emissions Calculations  
PTE of Proposed Revision (tons/year)  
From Surface Coating Operations**

**Company Name:** D & W, Inc.  
**Address City IN Zip:** 941 Oak St. Elkhart, Indiana 46514  
**Permit No.:** 039-28137-00195  
**Reviewer:** Hannah L. Desrosiers  
**Date Submitted:** June 23, 2009

**VOC & PARTICULATE EMISSIONS**

Material	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)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	<sup>a</sup> Actual VOC (lb/day)	Potential VOC tons per year	<sup>b</sup> Actual VOC (ton/yr)	<sup>c</sup> Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
"Worst Case" Coating	11.53	31.48%	0.00%	31.5%	0.00%	61.33%	0.0018	2,550.00	110.16	52.92	3.63	3.63	16.66	399.84	133.3	72.97	24.32	0.00	5.92	100.0%
Butyl Acetate (solvent)	7.31	100.00%	0.00%	100.0%	0.00%	0.00%	0.0003	2,550.00	18.36	5.59	7.31	7.31	5.59	134.21	44.7	24.49	8.16	0.00	N/A	100.0%
<b>Total State Potential Emissions</b>															<b>Uncontrolled</b>	<b>97.46</b>	<b>32.49</b>	<b>0.00</b>		

**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)  
<sup>a</sup> Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \*8t  
<sup>b</sup> Actual VOC tons per year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (2920 hr/yr) \* (1 ton/2000 lb)  
 Total State Potential Emissions = Worst Coating + Sum of all solvents used

**NOTES**

Total emissions based on rated capacity at 8,760 hours/year.  
<sup>c</sup> PM, PM10, and PM 2.5 emissions are assumed equal  
<sup>e</sup> Coatings are applied using flow coating application methods. Particulate emissions from the flow coating operation have been determined negligible, and are exempt from 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) pursuant to 326 IAC 6-3-(

**HAP EMISSIONS**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum Usage (unit/hour)	Weight % Lead Compounds	* Lead Compound Emissions (ton/yr)
"Worst Case" Coating	11.53	0.0018	2,550.00	3.10%	7.19
Butyl Acetate (solvent)	7.31	0.0003	2,550.00	0.00%	0.00
<b>Transfer Efficiency:</b>				<b>100.0%</b>	
<b>total State Potential Emissions</b>				<b>Total HAPs:</b>	<b>0.000</b>

**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

**NOTES**

Total emissions based on rated capacity at 8,760 hours/year.  
 \* Lead Compound Emissions relating to Surface Coating Operations are particulate in nature. The coating used by this source is applied using flow coating methods and PM emissions are considered negligible. Therefore, lead emissions are also considered ne

**Appendix A: Emissions Calculations**  
**Potential To Emit of the Entire Source Prior to Revision (tons/year)**

**Company Name:** D & W, Inc.  
**Address City IN Zip:** 941 Oak St. Elkhart, Indiana 46514  
**MSOP Permit No.:** 039-28137-00195  
**Reviewer:** Hannah L. Desrosiers  
**Date Submitted:** June 23, 2009

Potential Emissions (tons/year)						
Category	Emissions Generating Activity					
	Pollutant	Coating Line (GC1)	Degreasing	Wood Crating 1	Natural Gas Combustion (mult units)	TOTAL
Criteria Pollutants	PM	0.00	0	7.30	0.05	7.35
	PM10/PM2.5	0.00	0	7.30	0.19	7.49
	SO2	0	0	0	0.01	0.01
	NOx	0	0	0	2.50	2.50
	VOC	130.79	0.07	0	0.14	130.99
	CO	0	0	0	2.10	2.10
Hazardous Air Pollutants	Benzene	0	0	0	5.24E-05	5.24E-05
	Dichlorobenzene	0	0	0	3.00E-05	3.00E-05
	Ethyl Benzene	3.81	0	0	0	3.81
	Formaldehyde	0	0	0	1.87E-03	1.87E-03
	Hexane	0	0	0	4.49E-02	0.04
	Toluene	0	0	0	8.49E-05	8.49E-05
	Xylenes	2.54	0	0	0	2.54
	Cadmium	0	0	0	2.75E-05	2.75E-05
	Chromium	0	0	0	3.50E-05	3.50E-05
	Lead	0	0	0	1.25E-05	1.25E-05
	Manganese	0	0	0	9.49E-06	9.49E-06
	Nickel	0	0	0	5.24E-05	5.24E-05
	<b>Totals</b>	<b>6.346</b>	<b>0</b>	<b>0</b>	<b>0.047</b>	<b>6.39</b>
					<b>3.81</b>	

Total emissions based on rated capacity at 8,760 hours/year.

Controlled & Limited Emissions (tons/year)						
Category	Emissions Generating Activity					
	Pollutant	Coating Line (GC1)	Degreasing	Wood Crating 1	Natural Gas Combustion (mult units)	TOTAL
Criteria Pollutants	PM	0.00	0	1.83	0.05	1.87
	PM10/PM2.5	0.00	0	1.83	0.19	2.01
	SO2	0	0	0	0.01	0.01
	NOx	0	0	0	2.50	2.50
	VOC	< 80.0	0.07	0	0.14	80.21
	CO	0	0	0	2.10	2.10
Hazardous Air Pollutants	Benzene	0	0	0	5.24E-05	5.24E-05
	Dichlorobenzene	0	0	0	3.00E-05	3.00E-05
	Ethyl Benzene	2.33	0	0	0	2.33
	Formaldehyde	0	0	0	1.87E-03	1.87E-03
	Hexane	0	0	0	4.49E-02	0.04
	Toluene	0	0	0	8.49E-05	8.49E-05
	Xylenes	1.55	0	0	0	1.55
	Cadmium	0	0	0	2.75E-05	2.75E-05
	Chromium	0	0	0	3.50E-05	3.50E-05
	Lead	0	0	0	1.25E-05	1.25E-05
	Manganese	0	0	0	9.49E-06	9.49E-06
	Nickel	0	0	0	5.24E-05	5.24E-05
	<b>Totals</b>	<b>3.881</b>	<b>0</b>	<b>0</b>	<b>0.047</b>	<b>3.93</b>
					<b>2.33</b>	

Total emissions based on rated capacity at 8,760 hours/year.

**Appendix A: Emissions Calculations  
VOC, Particulate and HAP Emissions  
From Surface Coating Operations  
Glass Coating Line (GC1)**

**Company Name:** D & W, Inc.  
**Address City IN Zip:** 941 Oak St. Elkhart, Indiana 46514  
**MSOP Permit No.:** 039-28137-00195  
**Reviewer:** Hannah L. Desrosiers  
**Date Submitted:** June 23, 2009

**VOC & PARTICULATE EMISSIONS**

Material	Density of Material (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Material Usage (gal/unit)	Maximum Production Throughput (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency	
D & W Blue	10.33	38.66%	0.00%	38.7%	0.00%	61.33%	0.0022	2550	3.99	3.99	22.4	538	98.1	0.00	6.51	100%	
Butyl Acetate	7.31	100%	0.00%	100%	0.00%	0.00%	0.00040	2550	7.31	7.31	7.456	178.9	32.66	0.00	N/A	100%	
<b>Total State Potential Emissions</b>											<b>Uncontrolled</b>	<b>29.9</b>	<b>717</b>	<b>130.8</b>	<b>0.00</b>		

**METHODOLOGY**

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

**NOTES**

Total emissions based on rated capacity at 8,760 hours/year.  
 ° PM, PM10, and PM 2.5 emissions are assumed equal.  
 ° Coatings are applied using flow coating application methods. Particulate emissions from the flow coating operation have been determined negligible, and are exempt from 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) pursuant to 326 IAC 6-3-(b)(i)

**HAP EMISSIONS**

Material	Density of Material (lbs/gal)	Maximum Material Usage (gal/unit)	Maximum Production Throughput (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Xylene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	
D & W Blue	10.3	0.0022	2550	1.50%	1.00%	3.81	2.54	
Butyl Acetate	7.31	0.00040	2550	0.00%	0.00%	0.00	0.00	
<b>Total State Potential Emissions</b>						<b>Single HAP Totals</b>	<b>3.81</b>	<b>2.54</b>
						<b>Combined HAPs Total</b>	<b>6.35</b>	

**METHODOLOGY**

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

**NOTES**

Total emissions based on rated capacity at 8,760 hours/year.

**Appendix A: Emission Calculations  
 Degreasing Operations  
 VOC and HAP Emission Calculations**

**Company Name:** D & W, Inc.  
**Address City IN Zip:** 941 Oak St. Elkhart, Indiana 46514  
**Permit No.:** 039-28137-00195  
**Reviewer:** Hannah L. Desrosiers  
**Date Submitted:** June 23, 2009

Material	Material Usage (gal/day)	Material Density (lb/gal)	Maximum Usage (lbs/yr)	Weight % VOC	VOC Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	Solvent Brand Used
Cold Cleaner #1	0.0548	6.80	136	100%	0.068	0.00	Safety Kleen
<b>State Potential Emissions Uncontrolled (tons/yr):</b>					<b>0.068</b>	<b>0.00</b>	

**METHODOLOGY**

VOC/HAPs emission rate (tons/yr) = Material Usage (gal/day)\* solvent density (lbs/gal) \* Weight % VOC/HAP \* 365 days/yr \* 1 ton/2000 lbs

**NOTES**

Total emissions based on rated capacity at 8,760 hours/year.  
 MSDSs, submitted by the source, show the degreasers/cleaners to be HAP free.

**Appendix A: Emission Calculations  
Particulate Emissions from the  
Wood Cutting and Crating Operations**

**Company Name:** D & W, Inc.  
**Address City IN Zip:** 941 Oak St. Elkhart, Indiana 46514  
**Permit No.:** 039-28137-00195  
**Reviewer:** Hannah L. Desrosiers  
**Date Submitted:** June 23, 2009

Production Schedule (hrs/yr)	Weight of Material Collected (lbs/yr)	Amount Collected (lbs/hr)	Potential Collected (tons/yr)	Control Efficiency	PM Emissions after controls (lbs/hr)	PM Emissions after controls (tons/yr)
2,184	3,640	1.67	7.30	80.0%	0.417	<b>1.825</b>

**METHODOLOGY**

Actual collected (lbs/hr) = Weight of Material Collected (lbs/yr) / Production schedule (hrs/yr)  
 Potential collected (tons/yr) = Amount collected (lbs/hr) x 8,760 hrs/yr / 2,000 lbs/ton  
 Potential generated (lbs/hr) = amount collected (lbs/hr) / control efficiency (%)  
 Potential generated (tons/yr) = Potential generated (lbs/hr) \* (8760 hr/yr) \* (ton/2000 lb)  
 Emissions after controls (lbs/hr) = potential generated (lbs/hr) \* (1-control efficiency (%))  
 Emissions after controls (tons/yr) = Emissions after controls (lbs/hr) \* (8760 hr/yr) \* (ton/2000 lb)

**326 IAC 6-3-2(e) Allowable Rate of Emissions**

*** Process Weight Rate (total materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
600	0.30	<b>1.83</b>	8.02

**METHODOLOGY**

\*\*\*Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-59(a)).  
 Allowable Emissions (lb/hr) = 4.10(Process Weight Rate)<sup>0.67</sup>  
 Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)\*8760)/2000

**NOTES**

It is assumed that PM = PM10 = PM2.5  
 Total emissions based on rated capacity at 8,760 hours/year.  
 Data taken from calculations developed for FESOP #039-20619-00195.

Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (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.

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** D & W, Inc.  
**Address City IN Zip:** 941 Oak St. Elkhart, Indiana 46514  
**Permit No.:** 039-28137-00195  
**Reviewer:** Hannah L. Desrosiers  
**Date Submitted:** June 23, 2009

Combustion Source	# of units	Heat Input per unit (MMBtu/hr)	Total Heat Input (MMBtu/hr)
Boiler	1	1.23	1.23
Space Heaters	30	0.10	3.00
Space Heaters	6	0.13	0.75
Space Heaters	3	0.09	0.27
Space Heaters	2	0.23	0.45
<b>Total</b>	<b>42</b>	<b>1.77</b>	<b>5.70</b>

Potential Emission Rates for Boiler
0.00234 lbs/hr
1.900 lbs/MMCF
0.0019 lbs/MMBtu

Maximum Heat Input Capacity MMBtu/hr
1.23
4.47

Potential Throughput MMCF/yr
10.77
39.16

**Particulate Emissions**

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	5.7	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr Boiler	0.010	0.041	0.031	0.003	0.539	0.030	0.453
Potential Emission in tons/yr Space Heaters	0.037	0.149	0.112	0.012	1.96	0.11	1.64
<b>Totals</b>	<b>0.05</b>	<b>0.19</b>	<b>0.14</b>	<b>0.01</b>	<b>2.50</b>	<b>0.14</b>	<b>2.10</b>

\*PM emission factor is filterable fraction only. PM10 emission factor is filterable and condensable fractions combined. PM2.5 emission factor is condensable fraction only.

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

**HAPs Emissions - for all combustion units**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.10E-03	1.20E-03	0.08	1.80	3.40E-03
Potential Emission in tons/yr	5.24E-05	3.00E-05	1.87E-03	0.045	8.49E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	1.25E-05	2.75E-05	3.50E-05	9.49E-06	5.24E-05

**Total HAPs = 0.047 tons/yr**

**Worst Single H A P = 0.045 tons/yr**

**METHODOLOGY**

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Potential Emission Rate for Boiler (lbs/hr) = Potential PM emissions (tons/yr) \* [2000 (lbs/ton) / 8760 (hrs/yr)]

Potential Emission Rate for Boiler (lbs/MMCF) = [Potential PM emissions (tons/yr) \* 2000 (lbs/ton)] / Potential Throughput (MMCF/yr)

Potential Emission Rate for Boiler (lbs/MMBtu) = Potential Emission Rate for Boiler (lbs/hr) / Maximum Heat Input Capacity of Boiler (MMBtu/hr)

**NOTES**

All emission factors are based on normal firing.

Total emissions based on rated capacity at 8,760 hours/year.

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 (SUPPLEMENT D 3/98).



# 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)

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

TO: Scott Miller  
Plant Mgr.  
D & W, Inc.  
941 Oak St.  
Elkhart IN 46514

DATE: Sept. 18, 2009

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

SUBJECT: Final Decision  
MSOP  
039-28137-00195

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:  
Dana Armstrong, DECA Environmental & Assoc. Inc.  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Sept. 18, 2009

TO: Elkhart Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: D & W, Inc.**  
**Permit Number: 039-28137-00195**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	BMILLER 9/18/2009 D & W, Inc 039-28137-00195 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		Scott Miller Plant Mgr D & W, Inc 941 Oak St Elkhart IN 46514 (Source CAATS) <i>Via Confirmed Delivery</i>									
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
3		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)									
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
7		Dana Armstrong DECA Environmental & Associates, Inc. 410 1st Avenue NE Carmel IN 46032 (Consultant)									
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