



# 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: Dec. 22, 2009

RE: Alloy Custom Products / 157-28184-00461

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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**New Source Review and Federally Enforceable State  
Operating Permit  
OFFICE OF AIR QUALITY**

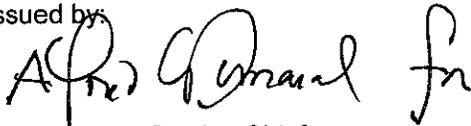
**Alloy Custom Products  
9701 SR 25 North  
Lafayette, Indiana 47905-4394**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F157-28184-00461	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 22, 2009 Expiration Date: December 22, 2014

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary manufacturing and repair of semi tanker trailers.

Source Address:	9701 SR 25 North, Lafayette, Indiana 47905-4394
Mailing Address:	9701 SR 25 North, Lafayette, Indiana 47905-4394
General Source Phone Number:	765-564-4684
SIC Code:	3443
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 [326 IAC 2-8-3(c)(3)]

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

(a) Shot Blasting unit:

One (1) manually operated shot blaster, consisting of primary and secondary blast tankers, identified as blast booth, installed in 1979, blasting steel and aluminum trailers, and cryogenic bottles, equipped with a baghouse to control particulates, exhaust returning inside the blast booth, maximum capacity: 875 pounds per hour of metal parts and 650 pounds per hour of coal slag abrasive media.

(b) Paint Spray Booths:

(1) One (1) South Paint Booth, identified as South Booth, constructed in 1979, maximum capacity of 0.086 units per hour, equipped with fabric filters for particulate control, exhausting outside through stack B;

(A) Painting steel and aluminum semi tanker trailers, and cryogenic bottles, utilizing two (2) High Volume Low Pressure (HPLV) spray guns.

(B) One (1) paint touch-up, clean-up and repair area, utilizing plastic squeegee spreader, caulking gun, and aerosol spray cans to repair steel and aluminum semi tanker trailers and cryogenic bottles.

(C) One (1) surface preparation operation (SP) area, polishing, buffing, sanding using handheld equipments.

(2) One (1) North Paint Booth, identified as North Booth, constructed in 2006, maximum capacity of 0.086 units per hour, equipped with fabric filters for particulate control, exhausting outside through stack A;

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- (A) Painting steel and aluminum semi tanker trailers, and cryogenic bottles, utilizing two (2) High Volume Low Pressure (HPLV) spray guns.
- (B) One (1) paint touch-up, clean-up and repair area, utilizing plastic squeegee spreader, caulking gun, and aerosol spray cans to repair steel and aluminum semi tanker trailers and cryogenic bottles.
- (C) One (1) surface preparation operation (SP) area, polishing, buffing, sanding using handheld equipments.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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

- (c) Natural Gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each;
  - (1) One (1) natural gas-fired Air make-up unit, installed in 1979, rated at 3.4 million British thermal units per hour, exhausting outside.
  - (2) One (1) natural gas-fired Air Make-up unit north booth, installed in 1968, rated at 1.878 million British thermal units per hour, exhausting outside.
  - (3) Sixteen (16) natural gas-fired space heaters, installed in 1968 (1), 1970 (3), 1979 (12), rated at 0.25 million British thermal units per hour each, exhausting outside.
  - (4) Three (3) natural gas-fired space heaters, installed in 1968 (2) and 1979 (1), rated at 0.30 million British thermal units per hour each, exhausting outside.
  - (5) Two (2) natural gas-fired space heaters, installed in 1979, rated at 0.20 million British thermal units per hour, each, exhausting outside.
- (d) Welding Operations, consisting of the following;
  - (1) Thirty Nine gas metal Arc (39) welding units, installed starting in 1994 and added to incrementally making a total of 39 as of 2009, maximum capacity: sixty metal parts per hour, and combined average process throughput of 1,036 lbs/hr, uncontrolled and exhausting inside the building.
  - (2) One (1) stick welding unit, installed in 1995, maximum capacity: two (2) metal parts per hour, and combined average process throughput of 90 lbs/hr combined, uncontrolled and exhausting inside the building.
  - (3) Twenty Five (25) TIG welding units, installed starting in 1994 and added to incrementally making a total of 25 as of 2009, maximum capacity: two (2) metal parts per hour, each, and combined average process throughput of 90 lbs/hr, uncontrolled and exhausting inside the building.
  - (4) Three (3) plasma cutting units, installed in 1995, 2001, and 2007, maximum capacity: six (6) parts per hour each, uncontrolled and exhausting inside the building.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, F157-28184-00461, 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]**

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Affidavit of Construction [326 IAC 2-5.1-3 (h)] [326 IAC 2-5.1-4]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### **B.5 Enforceability [326 IAC 2-8-6] [IC 13-17-12]**

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

### **B.6 Severability [326 IAC 2-8-4(4)]**

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (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.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (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.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(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).

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- (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.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F157-28184-00461 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,

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(2) revised, or

(3) deleted.

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

**B.15 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

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permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

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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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by 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 nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).
- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP 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.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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).

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- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue

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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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **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 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision 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] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

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- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

**C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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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.

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- (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (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 2-8-4(3)]**

**C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) 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.

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

(a) Shot Blasting unit:

One (1) manually operated shot blaster, consisting of primary and secondary blast tankers, identified as blast booth, installed in 1979, blasting steel and aluminum trailers, and cryogenic bottles, equipped with a baghouse to control particulates, exhaust returning inside the blast booth, maximum capacity: 875 pounds per hour of metal parts and 650 pounds per hour of coal slag abrasive media.

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

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the shot blasting operation shall not exceed 3.42 pounds per hour when operating at a process weight rate of 1,525 pounds per hour of metal and blasting media combined.

The pounds 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.1.2 Particulate Matter (PM<sub>10</sub>), (PM<sub>2.5</sub>) [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> and PM<sub>2.5</sub> emissions from shot blaster shall not exceed the hourly rate of 3.42 lbs/hr.

Compliance with these limits, combined with the potential to emit PM<sub>10</sub> and PM<sub>2.5</sub> emissions from other emission units at the source, shall limit the source-wide PM<sub>10</sub> and PM<sub>2.5</sub> emissions to less than 100 tons each per twelve consecutive month period and render 326 IAC 2-7 (Part 70), and 326 IAC 2-2 not applicable.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.4 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2 the baghouse for particulate controls shall be in operation and control emissions from the shot blaster at all times that the facility are in operation.
- (b) In the event that baghouse failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ

of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **D.1.5 Parametric Monitoring**

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The Permittee shall record the pressure drop across the baghouse used in conjunction with the shot blasting operation, at least once per day when the shot blasting is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.1.6 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

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- (a) To document compliance with Condition D.1.5, the Permittee shall maintain daily records of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### (b) Paint Spray Booths:

- (1) One (1) South Paint Booth, identified as South Booth, constructed in 1979, maximum capacity of 0.086 units per hour, equipped with fabric filters for particulate control, exhausting outside through stack B;
  - (A) Painting steel and aluminum semi tanker trailers, and cryogenic bottles, utilizing two (2) High Volume Low Pressure (HPLV) spray guns.
  - (B) One (1) paint touch-up, clean-up and repair area, utilizing plastic squeegee spreader, caulking gun, and aerosol spray cans to repair steel and aluminum semi tanker trailers and cryogenic bottles.
  - (C) One (1) surface preparation operation (SP) area, polishing, buffing, sanding using handheld equipments.
  
- (2) One (1) North Paint Booth, identified as North Booth, constructed in 1979, maximum capacity of 0.086 units per hour, equipped with fabric filters for particulate control, exhausting outside through stack B;
  - (A) Painting steel and aluminum semi tanker trailers, and cryogenic bottles, utilizing two (2) High Volume Low Pressure (HPLV) spray guns.
  - (B) One (1) paint touch-up, clean-up and repair area, utilizing plastic squeegee spreader, caulking gun, and aerosol spray cans to repair steel and aluminum semi tanker trailers and cryogenic bottles.
  - (C) One (1) surface preparation operation (SP) area, polishing, buffing, sanding using handheld equipments.

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

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 VOC Limitations [326 IAC 2-2] [326 IAC 2-8]

The total VOC input to North Paint Booth, South Paint Booth, touch-up and repair areas within both booths, dilution solvents and cleaning solvents to the surface coating operations, and their associated clean-up activities, including but not limited to the usage of sealants, bonding materials, caulks, shall not exceed ninety-nine (95) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit VOC emissions from the other emission units at the source, shall limit the VOC from the entire source to less than 100

tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7 (Part 70), and 326 IAC 2-2 (PSD) not applicable.

#### D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [326 IAC 2-4.1]

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- (a) The total input of any single hazardous air pollutant (HAP) at the North Paint Booth, South Paint Booth, touch-up and repair areas within both booths, dilution solvents and cleaning solvents to the surface coating operations, and their associated clean-up activities, including but not limited to the usage of sealants, bonding materials, caulks, shall not exceed nine (9.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total input of all hazardous air pollutants (HAPs) at the North Paint Booth, South Paint Booth, touch-up and repair areas within both booths, dilution solvents and cleaning solvents to the surface coating operations, and their associated clean-up activities, including but not limited to the usage of sealants, bonding materials, caulks, shall be limited to less than 22.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit HAP emissions from the other emission units at the source, shall limit single HAP to less than 10 tons per twelve (12) consecutive month period and total HAPs to less than 25 tons per twelve (12) consecutive month period. Compliance with these limits makes the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-4.1(MACT) not applicable.

#### D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

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Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating delivered to the applicator at the North Paint Booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air dried coatings.

#### D.2.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

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

#### D.2.5 Particulate Control

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Pursuant to 326 IAC 6-3-2(d), particulate from the North and the South paint booths including the paint touch-up and repair, cleaning operation shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.2.6 Particulate [326 IAC 6-3-2]

---

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the surface preparation operation (SP in the North and the South paint booths) shall not exceed 2.33 pounds per hour each when operating at a process weight rate of 860 pounds per hour of parts in the South and the North Booth each.

The pounds 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 = process weight rate in tons per hour

**D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.2.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]**

Compliance with the VOC and HAPs content and input limitations contained in Conditions D.2.1, D.2.2 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 and HAPs 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.

**D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

Compliance with the VOC content limit contained in Condition D.2.3 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings only on days when one or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water.

This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^n (C_i \times U_i)}{\sum_{i=1}^n U_i}$$

where: A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;

C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;

U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and

n is the number of coatings being averaged

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.2.3, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.2.10 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the North and the South surface coating booths stack A and B while the booths are in operation. If a condition exists which should result in a response step the permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C- Response to Excursions or Exceedances, shall be

considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks A and B and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) Monthly inspection shall be performed of the coating emissions by placing monitoring coupons in the air duct leading to the stacks A and B in the winter time if it is not feasible to inspect the rooftops. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **D.2.11 Record Keeping Requirements**

---

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.2.1 and D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC/HAP 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;
  - (5) The total VOC and total single HAP usage for each month; and
  - (6) The VOC and total single and combined HAP usage for each compliance period.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain a log of weekly overspray observations, once per day and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.2.12 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description IAC 2-8-4 (10): Insignificant Activities**

- (c) Natural Gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each;
  - (1) One (1) natural gas-fired Air make-up unit, installed in 1979, rated at 3.4 million British thermal units per hour, exhausting outside.
  - (2) One (1) natural gas-fired Air Make-up unit north booth, installed in 1968, rated at 1.878 million British thermal units per hour, exhausting outside.
  - (3) Sixteen (16) natural gas-fired space heaters, installed in 1968 (1), 1970 (3), 1979 (12), rated at 0.25 million British thermal units per hour each, exhausting outside.
  - (4) Three (3) natural gas-fired space heaters, installed in 1968 (2) and 1979 (1), rated at 0.30 Million British thermal units per hour each, exhausting outside.
  - (5) Two (2) natural gas-fired space heaters, installed in 1979, rated at 0.20 million British thermal units per hour, each, exhausting outside.
- (d) Welding Operations, consisting of the following;
  - (1) Thirty Nine gas metal Arc (39) welding units, installed starting in 1994 and added to incrementally making a total of 39 as of 2009, maximum capacity: sixty metal parts per hour, and combined average process throughput of 1,036 lbs/hr, uncontrolled and exhausting inside the building.
  - (2) One (1) stick welding unit, installed in 1995, maximum capacity: two (2) metal part per hour, and combined average process throughput of 90 lbs/hr combined, uncontrolled and exhausting inside the building.
  - (3) Twenty Five (25) TIG welding units, installed starting in 1994 and added to incrementally making a total of 25 as of 2009, maximum capacity: two (2) metal parts per hour, each, and combined average process throughput of 90 lbs/hr, uncontrolled and exhausting inside the building.
  - (4) Three (3) plasma cutting units, installed in 1995, 2001, and 2007, maximum capacity: six (6) parts per hour each, uncontrolled and exhausting inside the building.

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Alloy Custom Products  
Source Address: 9701 SR 25 North, Lafayette, Indiana 47905-4394  
Mailing Address: 9701 SR 25 North, Lafayette, In 47905-4394  
FESOP Permit No.: F157-28184-00461

**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  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Alloy Custom Products  
Source Address: 9701 SR 25 North, Lafayette, Indiana 47905-4394  
Mailing Address: 9701 SR 25 North, Lafayette, In 47905-4394  
FESOP Permit No.: F157-28184-00461

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

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

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

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Alloy Custom Products  
 Source Address: 9701 SR 25 North, Lafayette, Indiana 47905-4394  
 Mailing Address: 9701 SR 25 North, Lafayette, In 47905-4394  
 FESOP Permit No.: F157-28184-00461  
 Facility: Paint Booths - North Paint Booth, South Paint Booth

Parameter: VOC, single and combined HAPs usages

- Limit:
- (a) total VOC usage at the North Paint Booth, South Paint Booth, touch-up areas within both booths, dilution solvents and cleaning solvents to the surface coating operations, and their associated clean-up activities, including but not limited to the usage of sealants, bonding materials, caulks, shall be limited to less than 95.0 tons per twelve (12) consecutive month period.
  - (b) total usage of any single hazardous air pollutant (HAP) at the North paint Booth, South Paint Booth, touch-up and repair areas within both booths, dilution solvents and cleaning solvents to the surface coating operations, and their associated clean-up activities, including but not limited to the usage of sealants, bonding materials, caulks, shall be limited to less than 9.0 tons per twelve (12) consecutive month period.
  - (c) combined usage of all hazardous air pollutants (HAPs) at the North paint Booth, South Paint Booth, touch-up and repair areas within both booths, dilution solvents and cleaning solvents to the surface coating operations, and their associated clean-up activities, including but not limited to the usage of sealants, bonding materials, caulks shall be limited to less than 22.0 tons per twelve (12) consecutive month period

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

Month	Total Input Usage This Month (tons)			Total Input Usage Previous 11 Months (tons)			Total 12-Month Input Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

\* List the single HAP with the greatest emission rate

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE AND ENFORCEMENT BRANCH  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Alloy Custom Products  
 Source Address: 9701 SR 25 North, Lafayette, Indiana 47905-4394  
 Mailing Address: 9701 SR 25 North, Lafayette, In 47905-4394  
 FESOP Permit No.: F157-28184-00461

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

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

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

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

Mail to: Permit Administration & Support Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Alloy Custom Products  
9701 SR 25 North,  
Lafayette, Indiana 47905

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_  
(Company Name)
4. I hereby certify that Alloy Custom Products, Lafayette, Indiana 47905, completed construction of the manufacturing plant for production and repair of semi tanker trailer industry on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 30, 2009 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F157-28184-00461, Plant ID No. 157-00461 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a New Source Construction and Federally Enforceable Operating Permit (FESOP)

#### Source Description and Location

<b>Source Name:</b>	<b>Alloy Custom Products</b>
<b>Source Location:</b>	<b>9701 SR 25 North, Lafayette, Indiana 47905</b>
<b>County:</b>	<b>Tippecanoe</b>
<b>SIC Code:</b>	<b>3541</b>
<b>FESOP Permit No.:</b>	<b>F157-28184-00461</b>
<b>Permit Reviewer:</b>	<b>Swarna Prabha</b>

On June 30, 2009, the Office of Air Quality (OAQ) received an application from Alloy Custom Products related to the operation of an existing stationary semi tanker trailer manufacturing and repair facility.

#### History

There have been no previous approvals issued to this source. During the review of this application, Alloy Custom Products was identified as a business within the Indiana surface coating industry that engage in surface coating activities under "Surface Coaters Initiative" (SCI). This source has been in existence since 2000. This permit intends to bring the plant into compliance with construction and operating permit rules.

#### Existing Approvals

There have been no previous approvals issued to this source.

#### County Attainment Status

The source is located in Tippecanoe County.

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

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.  
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

*(Air Pollution Control Board; 326 IAC 1-4-80; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)*

- (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. Tippecanoe 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**  
Tippacanoe 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**  
Tippacanoe 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

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.

### Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units and control devices:

- (a) **Shot Blasting unit:**
- One (1) manually operated shot blaster, consisting of primary and secondary blast tanks, identified as blast booth, installed in 1979, blasting steel and aluminum trailers, and cryogenic bottles, equipped with a baghouse to control particulates, exhaust returning inside the blast booth, maximum capacity: 875 pounds per hour of metal parts and 650 pounds per hour of coal slag abrasive media.
- NOTE: Alloy Custom Products started operation of the shot blaster in January 1, 2000 when the source moved to the present facility. The previous owner built this facility in 1979. Although the shot blasting operation does not vent outside, it is not a totally sealed operation, therefore it is considered an emission source.
- (b) **Paint Spray Booths:**
- (1) One (1) South Paint Booth, identified as South Booth, constructed in 1979, maximum capacity of 0.086 units per hour, equipped with fabric filters for particulate control, exhausting outside through stack B;
- (A) Painting steel and aluminum semi tank trailers, and cryogenic bottles, utilizing two (2) High Volume Low Pressure (HPLV) spray guns.
- (B) One (1) paint touch-up, clean-up and repair area, utilizing plastic squeegee spreader, caulking gun, and aerosol spray cans to repair steel and aluminum semi tank trailers and cryogenic bottles.
- (C) One (1) surface preparation operation (SP) area, polishing, buffing, sanding using handheld equipments.
- (2) One (1) North Paint Booth, identified as North Booth, constructed in 2006, maximum capacity of 0.086 units per hour, equipped with fabric filters for particulate control, exhausting outside through stack A;
- (A) Painting steel and aluminum semi tank trailers, and cryogenic bottles, utilizing two (2) High Volume Low Pressure (HPLV) spray guns.
- (B) One (1) paint touch-up, clean-up and repair area, utilizing plastic squeegee spreader, caulking gun, and aerosol spray cans to repair steel and aluminum semi tank trailers and cryogenic bottles.

- (C) One (1) surface preparation operation (SP) area, polishing, buffing, sanding using handheld equipments.

NOTE: The manufacturer's fabric filter efficiency for in North and South paint booths are rated at 73% of all particles 5-6 microns in diameter and 100 % of all particles 15 micron and larger. For emission calculations the PM and PM10 efficiency used is 73 % and PM 99.9%.

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

- (c) Natural Gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each;
- (1) One (1) natural gas-fired Air make-up unit, installed in 1979, rated at 3.4 million British thermal units per hour, exhausting outside,
  - (2) One (1) natural gas-fired Air Make-up unit north booth, installed in 1968, rated at 1.878 million British thermal units per hour, exhausting outside,
  - (3) Sixteen (16) natural gas-fired space heaters, installed in 1968 (1), 1970 (3), 1979 (12), rated at 0.25 million British thermal units per hour each, exhausting outside.
  - (4) Three (3) natural gas-fired space heaters, installed in 1968 (2) and 1979 (1), rated at 0.30 million British thermal units per hour each, exhausting outside.
  - (5) Two (2) natural gas-fired space heaters, installed in 1979, rated at 0.20 million British thermal units per hour, each, exhausting outside.
- (d) Welding Operations, consisting of the following;
- (1) Thirty Nine (39) gas metal Arc welding units, installed starting in 1994 and added to incrementally making a total of 39 as of 2009, maximum capacity: sixty metal parts per hour, and combined average process throughput of 1,036 lbs/hr, uncontrolled and exhausting inside the building.
  - (2) One (1) stick welding unit, installed in 1995, maximum capacity: two (2) metal parts per hour, and combined average process throughput of 90 lbs/hr combined, uncontrolled and exhausting inside the building.
  - (3) Twenty Five (25) TIG welding units, installed starting in 1994 and added to incrementally making a total of 25 as of 2009, maximum capacity: two (2) metal parts per hour, each, and combined average process throughput of 90 lbs/hr, uncontrolled and exhausting inside the building.
  - (4) Three (3) plasma cutting units, installed in 1995, 2001, and 2007, maximum capacity: six (6) parts per hour each, uncontrolled and exhausting inside the building.

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

**Permit Level Determination – FESOP**

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	187.2
PM10 <sup>(1)</sup>	152.2
PM2.5	152.2
SO <sub>2</sub>	0.03
NO <sub>x</sub>	4.22
VOC	106.0
CO	3.89

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". USEPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

HAPs	Potential To Emit (tons/year)
Xylene	11.7
Toluene	7.9
Ethyle Benzene	2.98
Methanol	6.69
Manganese	1.44
Chromium	0.4
MIBK	7.29
<b>TOTAL HAPs</b>	<b>38.54</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM 10, PM2.5, and VOC is greater than 100 tons per year. The PTE of PM is less than 250 tone per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However the source has agreed to less than Title V major source threshold levels, therefore the source will be issued a FESOP (326 IAC 2-8).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**Potential to Emit of the Entire Source After Issuance of the FESOP**

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit (tons/year)								
	PM	*PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Total HAPs	Worst Single HAP
One (1) shot blaster	14.97	14.97 <sup>(1)</sup>	14.97 <sup>(1)</sup>	0.0	0	0	0	0	0
***North Booth	26.24	26.24	26.24	0.0	< 95.0**	0	0	< 22**	< 9** (Xylene)
***South Booth	26.24	26.24	26.24	0.0		0	0		
Welding and cutting	17.11	17.11	17.11	0	0	0	0	1.88	1.4 (Manganese)
Natural gas Combustion	0.09	0.35	0.35	0.03	0.25	3.89	4.22	0.087	0.08 (Hexane)
<b>Total PTE of Entire Source</b>	<b>84.65</b>	<b>84.91</b>	<b>84.91</b>	<b>0.03</b>	<b>&lt; 95.25</b>	<b>3.89</b>	<b>4.22</b>	<b>&lt; 25</b>	<b>&lt; 9</b> (Xylene)
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  
 \* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions.  
 \*\* Source-wide VOC, single HAP and combined HAPs are limited in order to comply with FESOP limits 326 IAC 2-8-4.  
 \*\*\* The emissions from surface preparation and paint touch up and repair area are included for each booth.  
 (1) Limited PTE are the same as the allowable emissions based on process throughput of shot blaster to comply with 326 IAC 2-8-4. The shot blaster emissions are controlled by a baghouse.  
 There is no emission factor for PM<sub>2.5</sub> in AP42, PM<sub>10</sub> = PM<sub>2.5</sub>

(a) **FESOP Status**

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and the combined HAPs will be limited to twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

(1) PM<sub>10</sub> and PM<sub>2.5</sub> Limitations:

The PM<sub>10</sub> and PM<sub>2.5</sub> emissions from the shot blasting operation shall be limited to 3.42 pounds per hour after control. Compliance with this limit shall limit the source-wide potential to emit of PM<sub>10</sub> and PM<sub>2.5</sub> to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 are not applicable.

(2) VOC Limitations:

The total amount of VOC usage at the North and South paint booths which includes paint operation, paint touch up and repair, plus the amount of VOCs used for clean-up solvents shall be limited to less than 95.0 tons per twelve (12) consecutive month period.

This input of VOCs limit is required to limit the source wide potential to emit of VOC to less than 100 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.

(3) HAPs Limitations:

(a) The total amount of any single HAP usage at the North and South paint booths which includes paint operation, paint touch up and repair, plus the usage of any single HAP used for clean-up solvents shall be limited to less than 9.0 tons per twelve (12) consecutive month period.

(b) The total amount of any combination of HAPs usage at the North and South paint booths, which includes paint operation, paint touch up and repair, plus the usage of any combination of HAPs used for clean-up solvents shall be limited to less than 22.0 tons per twelve (12) consecutive month period.

These usage limits are required to limit the source wide potential to emit of any single HAP and any combination of HAPs to less than 10 tons and 25 tons, respectively, per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because attainment regulated pollutant PM is less than 250 tons per year and the potential to emit all other attainment regulated pollutants are less than 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.

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

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR 63, 11169 Subpart HHHHHH, surface coating or paint stripping and miscellaneous surface coating operations at area source (40CFR Part 63.11169), because this source is not involved in the use of chemical strippers that contain methyl chloride (MeCl) in paint removal process, and the surface coating used at this source do not contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

(b) This source is not subject to the requirements 40 CFR 63 Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) because the source is not a major source of HAPs.

(c) This source is not subject to the requirements 40 CFR 63 Subpart T (National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning) because the source is not equipped with a cleaning machine.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR Part 63.11514, Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories ) are not included in the permit, because this source do not have the potential to emit metals, defined to be the compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), in the amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal).
- (e) There are no other new National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed permit.

Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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326 IAC 2-8-4 (FESOP)

FESOP applicability is discussed under the Potential to Emit After Issuance of the FESOP section above.

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

PSD applicability is discussed under the Potential to Emit of the Entire Source After Issuance of the FESOP section above.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit each individual hazardous air pollutant (HAP) is less than 10 tons per year and the potential to emit any combination of HAPs is less than 25 tons per year. Therefore, 326 IAC 2-4.1 does not apply.

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 the permit:

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

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

State Rule Applicability - shot blaster:

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

Pursuant to 326 IAC 6-3-2(Particulate Emission Limitations) this source shall operate the shot blaster so as not to produce, cause, or allow particulate matter to be emitted in excess of the following limits for each process.

Pursuant to 326 IAC 6-3-2, the particulate (PM) emissions from the one (1) manually operated shot blaster, shall be limited to 3.42 lbs/hour, when operating at a process weight rate of 1,525 pounds per hour of metal and coal slag per hour combined.

The pounds per hour limitations were calculated using the equation below.

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

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

The baghouse system must be in operation at all times when the shot blasting is in operation in order to comply with this limit. The Permittee shall operate the control device in accordance with manufacturer's specifications. The emissions from shot blaster after control are 9.4 tons per year, and the allowable are 14.97 tons per year, therefore the source will comply.

#### State Rule Applicability - North Paint Booth

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

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the North Paint Booth when painting must be controlled by dry filters, waterwash, or an equivalent control device and the control device must be operated in accordance with manufacturer's specifications. The source shall operate the dry filters in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 6-3-2(Particulate Emission Limitations) this source shall operate the surface preparation area (SP), in the North Paint Booth, so as not to produce, cause, or allow particulate matter to be emitted in excess of the following :

Pursuant to 326 IAC 6-3-2, the particulate (PM) emissions from the, shall be limited to 2.33 lbs/hour, when operating at a process weight rate of 860 pounds per hour of metal.

The pounds per hour limitations were calculated using the equation below.

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

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

The emissions are less than 2.33 lbs/hr without control, therefore it complies.

NOTE: The surface preparation areas which includes, polishing, buffing and sanding, are identical in the North and the South booth, the emissions are divided into half for each booth. See TSD Appendix A.

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

Pursuant to 8-2-1(a)(4) and 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 are applicable to the metal surface coating operations in the North Paint Booth, identified as North Booth, which was constructed after July 1, 1990 and has actual emissions greater than 15 lbs/day. Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating delivered to the applicators at the North Booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Compliance with the VOC content limit in North paint booth, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water. This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^n (C_i \times U_i)}{\sum_{i=1}^n U_i}$$

Where:

- A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;
- C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;
- U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and
- n is the number of coatings being averaged

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The table below summaries metal surface coating operations in the North paint booth. Based on the maximum usage information provided by the source, the volume weighted VOC content of the coatings is 3.44 pounds of VOC per gallon, which is less than 3.5 pounds per gallon, excluding water. Therefore, North Paint Booth shall be able to comply with 326 IAC 8-2-9(d).

Unit ID/Metal surface Coating Material	VOC content of coatings	Maximum Paint usage	Maximum Paint usage	Volume-Weighted VOC content (Ci*Ui)
<b>North Paint Booth</b>	lbs/gal (C)	gal/hr	gal/day (U)	lbs VOC/gal
Primer Jones-Blair:JB33304/01	3.06	0.648	5.18	15.85
Primer Catalyst Jones-Blair:JB99953/04	3.7	0.648	5.18	19.17
Color Coat Jones-Blair:JB45070/01	3.66	0.648	5.18	18.96
Catalyst Jones-Blair:JB99951/04	0.95	0.216	1.728	1.63
Clear coat Jones-Blair:JB45072/01	3.95	0.294	2.35	9.28
Catalyst Jones-Blair:JB99951/04	0.95	0.097	0.72	0.68
Thinner Jone Blair 21092	7.21	0.147	1.17	8.43
<b>Total</b>			<b>21.51</b>	<b>74</b>
<b>Volume Weighted Average</b>				<b>3.44</b>

Based on the MSDS submitted by the source and calculations made, the North paint booth is in compliance with this requirement. The clean up solvent is not subject to the requirements of this rule because the clean up solvent is not used to coat metal.

326 IAC 8-1-6 (New facilities; general reduction requirements)

The requirements of 326 IAC 8-1-6 are not applicable to North Paint Booth, since this booth is specifically regulated by 326 IAC 8-9-2.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The clean up solvent that is used at the new facilities after January 1, 1980, the North Paint Booth is not subject to the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations) because the clean up solvent is not used in conjunction with any type of cleaning machine.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1(1), the clean up solvent that is used at the North Paint Booth is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because the source is located in Tippacano County and potential VOC emissions from the clean up solvent are less than one hundred (100) tons per year.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

This source is not subject to the requirements of the 326 IAC 20-6-1, since the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

State Rule Applicability - South Paint Booth:

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

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the South Paint Booth when painting must be controlled by dry filters, waterwash, or an equivalent control device and the control device must be operated in accordance with manufacturer's specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The South Paint Booth was constructed in 1979, which was before the applicability date of January 1, 1980. Therefore, this booth is not subject to 326 IAC 8-1-6.

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990, located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add on controls and operations include surface coating of metal parts or products. The South Paint Booth was constructed in 1979 and is located in Tippecanoe County, therefore 326 IAC 8-2-9 does not apply.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The clean up solvent that is used at the South Paint Booth is not subject to the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations) because the clean up solvent is not used in conjunction with any type of cleaning machine.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1(1), the clean up solvent that is used at the South Paint Booth is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because the source is located in Tippacano County and potential VOC emissions from the clean up solvent are less than one hundred (100) tons per year.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

This source is not subject to the requirements of the 326 IAC 20-6-1, since the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

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

Pursuant to 326 IAC 6-3-2(Particulate Emission Limitations) this source shall operate the surface preparation area (SP), in the South paint booth, so as not to produce, cause, or allow particulate matter to be emitted in excess of the following limits for each process.

Pursuant to 326 IAC 6-3-2, the particulate (PM) emissions from the, shall be limited to 2.33 lbs/hour, when operating at a process weight rate of 860 pounds per hour of metal.

The pounds per hour limitations were calculated using the equation below.

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

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

The emissions are less than 2.33 lbs/hr without control, therefore it complies.

NOTE: The surface preparation areas which includes, polishing, buffing and sanding, are identical in the North booth and the South booth, the emissions are divided into half for each booth. See TSD Appendix A.

#### State Rule Applicability - Welding and Cutting operation

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

Pursuant to 326 IAC 6-3-1(a), particulate emissions from manufacturing processes, located anywhere in the state, unless specifically exempted by 326 IAC 6-3-1(b) shall follow the work practices and control technologies contained in 326 IAC 6-3-2, subsections (b) through (d), or be limited according to 326 IAC 6-3-2(e), as applicable.

- (a) Pursuant to 326 IAC 6-3-2, the particulate (PM) emissions from twenty-six (26) Metal Inert Gas (MIG) welding stations combined, welding metal parts, shall be limited to 2.64 pounds of PM per hour, when operating at a process weight rate of 1,036 lbs/hr.

These pounds per hour limitation was calculated using the equation below.

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

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

The PM emissions from the thirty-nine (39) welding stations are 1.89 pounds of PM per hour, which is less than the allowable of 2.64 pounds of PM per hour combined, therefore it complies.

- (b) Pursuant to 326 IAC 6-3-1(b)(9), the one (1) stick welding station, is exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day each.
- (c) Pursuant to 326 IAC 6-3-1(b)(9), the twenty-five (25) TIG welding stations; four (4) TIG carbon steel, nine (9) aluminum, and twelve (12) stainless steel, are each exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day each.
- (d) Pursuant to 326 IAC 6-3-1(b)(14), the source-wide cutting operations is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because it has the potential to emit particulate matter less than 0.551 pounds per hour.

#### State Rule Applicability - Natural Gas space heaters

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

The natural gas-fired space heaters, units are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the source-wide space heaters are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because they have the combined potential to emit particulate matter less than 0.551 pounds per hour.

##### 326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The space heaters are not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions of sulfur dioxide are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

326 IAC 12 (New Source Performance Standards)  
 See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)  
 See Federal Rule Applicability Section of this TSD.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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Permits issued under 326 IAC 2-7 or 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5 or 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Compliance monitoring requirements applicable to the emission facilities are as follows:

- (a) These monitoring conditions are necessary because the dust collectors for the shot blaster, must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and IAC326 2-8 (FESOP).The Compliance monitoring requirements applicable to shot blaster :

Units / Control	Parameter	Frequency	Range	Excursions and Exceedances
Shot blaster/ Baghouse	Water Pressure Drop	Daily	2 to 6 inches	Response Steps

- (b) Broken or Failed Bag Detection  
 The Permittee shall maintain the baghouse and replace broken or failed bags as needed.
- (c) Testing is not required on baghouse compliance will be demonstrated through proper operation and parametric monitoring of the dust collectors. The shot blaster exhaust return inside the blast booth, there is no vent exhausting outside.
- (d) IDEM has determined that compliance with the VOC content limits in 326 IAC 8 can be established by using the data contained in the relevant MSDS and through calculations performed by the Permittee. The compliance determination and monitoring requirements for the North and South paint booths applicable are as follows:

- (1) Compliance 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 copies of "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.
- (2) Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

No stack test is required for this source because compliance with the FESOP limit for VOC can be determined by evaluating MSDSs and keeping records of the amount of VOC applied. The use of dry filters ensures compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 6-3 (Process Operations). The compliance monitoring requirements included in the permit should ensure compliance with these rules.

NOTE: Monthly inspection of coating emissions from the stacks A and B and the presence of overspray on the rooftops would create a potential hazard for personnel to perform these inspections in the winter. The Permittee shall create a protocol of placing monitoring coupons in the air duct leading to the stacks A and B and perform monthly inspection and change the coupons as necessary.

#### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 30, 2009, and additional information received on August 19, 2009, August 24, 2009, September 3, 2009, September 29, 2009 and October 7, 2009.

The continued operation of this source shall be subject to the conditions of the attached proposed FESOP. 157-28184-00461. The staff recommends to the Commissioner that this FESOP be approved.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Swarna Prabha 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) 234-5376 or toll free at 1-800-451-6027 extension 4-5376.
- (b) A copy of the findings is available on the Internet at: [www.in.gov/idem/ai/appfiles/idem-caats/](http://www.in.gov/idem/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/)

Category	Uncontrolled Potential Emissions (tons/year)						
	Emissions Generating Activity						
Criteria Pollutants	Pollutant	Shot blasting blasting	*North Booth 2006	*South Booth 1979	Welding Operations	Natural Gas Combustion	TOTAL
	PM	117.54	26.24	26.24	17.11	0.09	187.2
	PM10	82.28	26.24	26.24	17.11	0.35	152.2
	PM2.5	82.28	26.24	26.24	17.11	0.35	152.2
	SO2	0	0	0	0	0.03	0
	NOx	0	0	0	0	4.22	4.22
	VOC	0	52.87	52.87	0	0.25	106.0
	CO	0	0	0	0	3.89	3.89
Hazardous Air Pollutants	Xylenes	0.0	5.83	5.83	0	0	11.7
	Toluene	0.0	3.98	3.98	0	0	8.0
	Ethyl Benzene	0.0	1.50	1.50	0	0	3.00
	Benzene	0.0	0	0	0	9.73E-05	9.7E-05
	Hexane	0.0	0	0	0	0.08	0.08
	Formaldehyde	0.0	0	0	0	3.47E-03	3.5E-03
	Chromium	0.0	0	0	0.36	6.49E-05	0.36
	Nickel	0.0	0	0	0.08	9.73E-05	0.08
	Methanol	0.0	3.35	3.35	0	0	6.69
	Manganese	0.0	0	0	1.4	0	1.44
	Cobalt	0.0	0	0	9.46E-03	0	9.5E-03
	MIBK	0.0	3.64	3.64	0	0	7.28
	<b>Totals</b>	0.0	18.30	18.30	1.88	0.087	38.56

Category	Controlled Potential Emissions (tons/year)						
	Emissions Generating Activity						
Criteria Pollutants	Pollutant	Shot blasting blasting	North Booth 2006	South Booth 1979	Welding Operations	Natural Gas Combustion	TOTAL
	PM	9.40	0.08	0.08	17.11	0.09	26.8
	PM10	16.46	6.24	6.24	17.11	0.35	46.4
	PM2.5	16.46	6.24	6.24	17.11	0.35	46.4
	SO2	0	0	0	0	0.03	0.0
	NOx	0	0	0	0	4.22	4.22
	VOC	0	< 95**		0	0.25	< 95.25
	CO	0	0	0	0	3.89	3.89
	Hazardous Air Pollutants	Xylenes	0.0	< 9.0***		0	0
Toluene		0.0	3.98	3.98	0	0	8.0
Ethyl Benzene		0.0	1.50	1.50	0	0	3.00
Benzene		0.0	0.0	0.0	0	9.73E-05	9.7E-05
Hexane		0.0	0.0	0.0	0	0.08	0.08
Formaldehyde		0.0	0.0	0.0	0	3.47E-03	3.5E-03
Chromium		0.0	0.0	0.0	0.36	6.49E-05	0.36
Nickel		0.0	0.0	0.0	0.08	9.73E-05	0.08
Methanol		0.0	3.35	3.35	0.0	0	6.70
Manganese		0.0	0.0	0.0	1.4	0	1.44
Cobalt		0.0	0	0	9.5E-03	0	9.5E-03
MIBK		0.0	3.64	3.64	0.0	0	7.28
<b>Totals</b>		0.0	12.47	12.47	1.88	0.087	<25***

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits. The process throughput through North and the South booth is equal.

NOTES:

1. On May 8, 2008 U. S. EPA promulgated the new requirements for Prevention Of Significant Deterioration (PSD) for PM 2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC2-2, to include those requirements. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD regulate PM2.5 emissions, it has directed states to regulate PM10 emissions as a

\* The North and the South booth each includes one half of emissions from paint touch up, repair and surface preparation areas ( Appendix A Page 5 and 6).

\*\* VOC emission limits for North and South booths in order to comply with FESOP limits 326 IAC 2-8-4.

\*\*\* Single and combined HAPs emission limits for North and South booths to comply with FESOP limits 326 IAC 2-8-4.

2. There are no emission factors in AP42 for PM2.5, PM10 = PM2.5

**Appendix A: Emission Calculations  
Abrasive Blasting - Confined**

**Company Name: Alloy Custom Products  
Address City IN Zip: 9701 SR 25 North  
Permit Number: F157-28184-00461  
Reviewer: Swarna Prabha**

**Table 1 - Emission Factors for Abrasives**

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

**Table 2 - Density of Abrasives (lb/ft3)**

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

yellow indicates data selected  
or provided by Alloy Custom Products

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

Flow rate (FR1) of sand through a blasting nozzle as a function of nozzle pressure and internal diameter (ID1)

Nozzle Type (diameter)	Internal diameter, in	Nozzle Pressure (psig)							
		30	40	50	60	70	80	90	100
No. 2 (1/8 inch)	0.125	28	35	42	49	55	63	70	77
No. 3 (3/16 inch)	0.1875	65	80	94	107	122	135	149	165
No. 4 (1/4 inch)	0.25	109	138	168	195	221	255	280	309
No. 5 (5/16 inch)	0.3125	205	247	292	354	377	420	462	507
No. 6 (3/8 inch)	0.375	285	355	417	477	540	600	657	720
No. 7 (7/16 inch)	0.4375	385	472	560	645	755	820	905	940
No. 8 (1/2 inch)	0.5	503	615	725	835	945	1050	1160	1265
No. 10 (5/8 inch)	0.625	820	990	1170	1336	1510	1680	1850	2030
No. 12 (3/4 inch)	0.75	1140	1420	1670	1915	2160	2400	2630	2880
No. 16 (1 inch)	1	2030	2460	2900	3340	3780	4200	4640	5060

Sand appears to be data that's properties closest resemble the properties of Black Beauty Blast Media

**CALCULATIONS**

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters	
Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)	
D1 = Density of sand from Table 2 =	99 lb/ft3
ID1 = Internal diameter of nozzle for sand blasting from Table 3 =	0.375 inch
FR1 = Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3 =	720 lb/hr
D = Density of actual abrasive =	90 lb/ft3
ID = internal diameter of actual nozzle =	0.375 inch
FR = Flow rate of actual abrasive (lb/hr) =	654.5 lb/hr (per nozzle)

Potential to Emit Before Control	
FR = Flow rate of actual abrasive (lb/hr) =	654.5 lb/hr (per nozzle)
w = fraction of time of wet blasting =	0 %
N = number of nozzles =	1
EF = PM emission factor for actual abrasive from Table 1 =	0.041 lb PM/ lb abrasive
PM10 emission factor ratio for actual abrasive from Table 1 =	0.70 lb PM10 / lb PM
<b>Potential to Emit (before control) =</b>	<b>PM 26.836 18.785 lb/hr</b>
=	<b>644.07 450.85 lb/day</b>
=	<b>117.54 82.28 ton/yr</b>

Potential to Emit After Control	
<b>Emission Control Device Efficiency =</b>	<b>PM 92.0% 80.0%</b>
<b>Potential to Emit (after control) =</b>	<b>2.1E+00 3.8E+00 lb/hr</b>
=	<b>51.526 90.170 lb/day</b>
=	<b>9.403 16.456 ton/yr</b>

**METHODOLOGY**

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)  
 Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)^2 x (D/D1)  
 Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))  
 Potential to Emit (after control) = [Potential to Emit (before control)] \* [1 - control efficiency]  
 Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

**Appendix A: Emissions Calculations  
VOC and Particulate**

**From Surface Coating Operations ( North paint Booth- constructed in 2006)**

**Company Name: Alloy Custom Products  
Address City IN Zip: 9701 SR 25 North, Lafayette, IN 47905  
Permit Number: 157-28184-00461  
Reviewer: Swarna Prabha**

Material	JONES-BLAIR PAINT SYSTEM	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/hr)	VOC (lbs/gal) of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)*	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE PM/PM10 before control (ton/yr)	PTE PM/PM10 after control (ton/yr)	lb VOC/gal solids	Transfer Efficiency		
Jones-Blair:JB33304/01	PRIMER	12.1	25.20%	0.0%	25.2%	0.0%	74.80%	7.50	0.086	0.648	3.06	1.98	10.89	47.54	8.68	6.70	0.01	4.09	74%		
Jones-Blair:JB99953/04	PRIMER CATALYST	12.7	29.10%	0.0%	29.1%	0.0%	70.90%	7.50	0.086	0.648	3.70	2.40	13.20	57.61	10.51	6.66	0.01	5.22	74%		
Jones-Blair:JB45070/01	COLOR COAT	10.5	34.80%	0.0%	34.8%	0.0%	65.20%	7.50	0.086	0.648	3.66	2.37	13.05	56.94	10.39	5.06	0.01	5.61	74%		
Jones-Blair:JB99951/04	CATALYST	9.5	10.00%	0.0%	10.0%	0.0%	90.00%	2.50	0.086	0.216	0.95	0.21	1.13	4.92	0.90	2.10	0.00	1.06	74%		
Jones-Blair:JB45072/01	CLEAR COAT	8.3	47.60%	0.0%	47.6%	0.0%	53.90%	3.40	0.086	0.294	3.95	1.16	6.38	27.85	5.08	1.45	0.00	7.33	74%		
Jones-Blair:JB99951/04	CATALYST	9.5	10.00%	0.0%	10.0%	0.0%	90.00%	1.13	0.086	0.097	0.95	0.09	0.51	2.22	0.40	0.95	0.00	1.06	74%		
Jone Blair 21092	Thinner	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	1.70	0.086	0.147	7.21	1.06	5.82	25.42	4.64	0.00	0.00	0.00	74%		
												<b>9.27</b>	<b>50.99</b>	<b>222.50</b>	<b>40.61</b>	<b>22.92</b>	<b>0.02</b>	<b>24.37</b>			

**HAPS**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Weight % MIBK	Xylene Emissions (ton/yr)	Ethyl Benzene (ton/yr)	MIBK (ton/yr)	Total HAP Emissions (ton/yr)
Jones-Blair:JB33304/01	12.1	7.50	0.086	6.73%	1.00%	5.80%	2.32	0.34	2.00	4.66
Jones-Blair:JB99953/04	12.7	7.50	0.086	5.00%	1.00%	0.00%	1.807	0.361	0.00	2.168
Jones-Blair:JB45070/01	10.5	7.50	0.086	0.00%	1.00%	0.00%	0.00	0.299	0.00	0.299
Jones-Blair:JB99951/04	9.5	2.50	0.086	0.00%	1.50%	0.00%	0.00	0.135	0.00	0.135
Jones-Blair:JB45072/01	8.3	3.40	0.086	5.00%	1.00%	0.00%	0.534	0.107	0.00	0.641
Jones-Blair:JB99951/04	9.5	1.13	0.086	0.00%	1.50%	0.00%	0.000	0.061	0.00	0.061
Jone Blair 21092	7.2	1.70	0.086	24.48%	3.80%	25.58%	1.134	0.176	1.18	2.49
<b>Total HAPs</b>							<b>5.79</b>	<b>1.48</b>	<b>3.18</b>	<b>10.46</b>

<b>Dry filter control efficiency- PM</b>	<b>99.9%</b>	<b>0.02</b>
<b>Dry filter control efficiency-PM10, PM2.5</b>	<b>73%</b>	<b>6.19</b>

- Weight % Exempt is weight % of exempt non-photochemical reactive organic compounds.
- Maximum Capacities as reported by source, based on historical production and actual coating materials used per unit.
- Paint guns are Kremlin HVLP M22 rated at 74% transfer efficiency at 30 - 45 PSI air pressure & 12" spray pattern
- Fabric filter media captures 73% of all particles 5-6 microns in size and 100 % of all particles 15 microns and larger - manufacturers rated efficiency
- Note: Maximum units per hour is determined based on ;  
**AVERAGE TIME TO PAINT REPAIR TRAILER 92.86 MAN HOURS -- TWO MEN PER TRAILER' TIME IN BOOTH. HOURS DRY TIME BETWEEN PRIMER AND COLOR 5 Hrs**  
**DRY TIME BETWEEN COLOR AND PRIMER 8 Hrs DRY TIME PRIOR TO REMOVAL 8 Hrs TOTAL BOOTH TIME 69.43 HRS FOR JONES BLAIR PAINT FOR THREE COATS**  
**EACH PAINT COMPONENT OF THE PAINT TAKES 1/6 OF THE TOTAL TIME 69.43 / 6 = 11.57 Hrs per component or 1/11.57 = .0864 units per hour.**
- Process throughput is identical through South and North paint booths except North paint booth was built in 2006, whereas South paint Booth was built in 1979 .

**METHODOLOGY**

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

7. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

From Surface Coating Operations ( South paint Booth- constructed in 1979)

Company Name: Alloy Custom Products  
Address City IN Zip: 9701 SR 25 North, Lafayette, IN 47905  
Permit Number: 157-28184-00461  
Reviewer: Swarna Prabha

South paint Booth- VOC and PM

Material JONES-BLAIR PAINT SYSTEM		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/hr)	VOC (lbs/gal) of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)*	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE PM/PM10 before control(ton/yr)	PTE PM/PM10 after control (ton/yr)	lb VOC/gal solids	Transfer Efficiency		
Jones-Blair:JB33304/01	PRIMER	12.1	25.20%	0.0%	25.2%	0.0%	74.80%	7.50	0.086	0.648	3.06	1.98	10.89	47.54	8.68	6.70	0.01	4.09	74%		
Jones-Blair:JB99953/04	PRIMER CATALYST	12.7	29.10%	0.0%	29.1%	0.0%	70.90%	7.50	0.086	0.648	3.70	2.40	13.20	57.61	10.51	6.66	0.01	5.22	74%		
Jones-Blair:JB45070/01	COLOR COAT	10.5	34.80%	0.0%	34.8%	0.0%	65.20%	7.50	0.086	0.648	3.66	2.37	13.05	56.94	10.39	5.06	0.01	5.61	74%		
Jones-Blair:JB99951/04	CATALYST	9.5	10.00%	0.0%	10.0%	0.0%	90.00%	2.50	0.086	0.216	0.95	0.21	1.13	4.92	0.90	2.10	0.00	1.06	74%		
Jones-Blair:JB45072/01	CLEAR COAT	8.3	47.60%	0.0%	47.6%	0.0%	53.90%	3.40	0.086	0.294	3.95	1.16	6.38	27.85	5.08	1.45	0.00	7.33	74%		
Jones-Blair:JB99951/04	CATAYLST	9.5	10.00%	0.0%	10.0%	0.0%	90.00%	1.13	0.086	0.097	0.95	0.09	0.51	2.22	0.40	0.95	0.00	1.06	74%		
Jone Blair 21092	Thinner	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	1.70	0.086	0.147	7.20	1.06	5.82	25.38	4.63	0.00	0.00	#DIV/0!	74%		
												9.27	50.98	222.46	40.60	22.92	0.02				

HAPS

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Weight % MIBK	Xylene Emissions (ton/yr)	Ethyl Benzene (ton/yr)	MIBK (ton/yr)	Total HAP Emissions (ton/yr)
Jones-Blair:JB33304/01	12.1	7.50	0.086	6.73%	1.00%	5.80%	2.32	0.34	2.00	4.66
Jones-Blair:JB99953/04	12.7	7.50	0.086	5.00%	1.00%	0.00%	1.807	0.361	0.00	2.168
Jones-Blair:JB45070/01	10.5	7.50	0.086	0.00%	1.00%	0.00%	0.000	0.299	0.00	0.299
Jones-Blair:JB99951/04	9.5	2.50	0.086	0.00%	1.50%	0.00%	0.000	0.135	0.00	0.135
Jones-Blair:JB45072/01	8.3	3.40	0.086	5.00%	1.00%	0.00%	0.534	0.107	0.00	0.641
Jones-Blair:JB99951/04	9.5	1.13	0.086	0.00%	1.50%	0.00%	0.000	0.061	0.00	0.061
Jones-Blair:21092	7.2	1.70	0.086	24.48%	3.80%	25.80%	1.134	0.18	1.20	2.505
Total HAPs							5.79	1.48	3.19	10.47

Dry filter control efficiency- PM	99.9%	0.02
Dry filter control efficiency-PM10, PM2.5	73%	6.19

1. Weight % Exempt is weight % of exempt non-photochemical reactive organic compounds.

2. Maximum Capacities as reported by source, based on historical production and actual coating materials used per unit.

3. PAINT GUNS ARE KREMLIN HVLP M22 RATED AT 74% TRANSFER EFFIECENCY

AT 30 - 45 PSI AIR PRESSURE & 12" SPRAY PATTERN

4. Fabric filter media captures 73% of all particles 5-6 microns in size and 100 % of all particles 15 microns and larger.

Note: Maximum units per hour is determined based on ;

5. AVERAGE TIME TO PAINT REPAIR TRAILER 92.86 MAN HOURS – TWO MEN PER TRAILER' TIME IN BOOTH. HOURS DRY TIME BETWEEN PRIMER AND COLOR 5 Hrs  
 DRY TIME BETWEEN COLOR AND PRIMER 8 Hrs DRY TIME PRIOR TO REMOVAL 8 Hrs TOTAL BOOTH TIME 69.43 HRS FOR JONES BLAIR PAINT FOR THREE COATS  
 EACH PAINT COMPONENT OF THE PAINT TAKES 1/6 OF THE TOTAL TIME 69.43 / 6 = 11.57 Hrs per component or 1/11.57 = .0864 units per hour.

6. Process throughput is identical through South and North paint booths except North paint booth was built in 2006, whereas South Booth was built in 1979 .

The 326 IAC 8-2-9 is not applicable to South Booth because it was built prior to 1980.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

7. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

**Appendix A: Emission Calculations**  
**touch up and repair area- North and South Paint Booths combined**

**Company Name: Alloy Custom Products**  
**Address City IN Zip: 9701 SR 25 North, Lafayette, IN 47905**  
**FESOP Renewal No.: F039-28184-00461**  
**Reviewer: Swarna Prabha**

**Clean up, touch-up and spot treating- metal parts**

ID Number	Coating Name	Ave. Gallons	Density	% VOC	% Solids	%Solids	VOC	Solids	Toluene	Methanol	MIBK	Xylenes	Ethyl	Methyl ethyl	styrene
		Per Vehicle	(lbs/gal)	by WT.	by WT.	by Vol.	(lbs/gal)	(lbs/gal)	% by Wt.	% by Wt.					
<b>Touch up/repair operation</b>															
PPG:Q1390-9053	Air Products Green Aerosol Can <sup>7</sup>	0.219	6.30	83.60%	16.50%	0.00%	5.27	1.04	0.00%	0.00%	0.00%	16.00%	5.00%	0.00%	
SEM39683	SEM Self Etching Gray Primer ( 8 oz ) Aerosol <sup>8</sup>	0.219	6.49	59.00%	41.00%	0.00%	3.83	2.66	10.00%	0.00%	0.00%	2.50%	0.00%	10.00%	
SUNDRIES:	Transtar 1K Self-Etching Primer ( 8 oz ) Aerosol <sup>8</sup>	0.083	6.99	78.00%	21.90%	0.00%	5.45	1.53	5.00%	0.00%	0.00%	0.00%	0.00%	10.00%	
<b>Clean up operation</b>															
Jones-Blair:JB21092/01	JB Universal Thinner - 1-Gallon <sup>1</sup>	0.680	7.21	100.00%	0.00%	0.00%	7.21	0.00	0.00%	0.00%	25.80%	24.48%	3.89%	0.00%	
MOR10005/05	Advantage Virgin Lacquer Thinner <sup>2</sup>	1.870	6.90	100.00%	0.00%	0.00%	6.90	0.00	70.00%	30.00%	0.00%	0.00%	0.00%	0.00%	
MOR15015/55	General Purpose Clean-Up Thinner <sup>2</sup>	12.030	7.11	100.00%	0.00%	0.00%	7.11	0.00	30.00%	30.00%	0.00%	0.00%	0.00%	0.00%	
PAS71611	GAL Denatured Alcohol <sup>2</sup>	0.083	6.76	100.00%	0.00%	0.00%	6.76	0.00	0.00%	5.00%	5.00%	0.00%	0.00%	0.00%	
<b>Body Fillers and Misc Products</b>															
1414	Top Gun 200 Sil Acrylic Caulk - White <sup>3</sup> ( 12 oz tube )	0.166	13.69	32.0%	68.0%	0.32	4.38	9.31	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
USC21330	Feather Rite Body Filler <sup>2</sup> ( 1 Gallon Can)	0.417	8.82	20.0%	80.0%	-	1.76	7.06	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%
USC26006	Icing Putty - 24 oz. Tube <sup>5</sup>	0.058	9.16	30.0%	70.0%	0.022	2.75	6.41	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	30.00%
USC32035	Red Glazing Spot Putty - 1 LB Tube <sup>6</sup>	0.115	13.07	29.0%	71.0%	-	3.79	9.28	15.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%
SC0269 124	Alumi Elastic Sealing Compound <sup>4</sup>	0.073	13.4	0.0%	96.0%	-	0.00	12.86	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

ID Number	Coating Name	Gallons/	Transfer	Application
		Hour	Efficiency	Method
<b>Touch up/repair operation</b>				
PPG:Q1390-9053	Air Products Green Aerosol Can <sup>7,repair</sup>	0.011	50%	Aerosol Spray Can
SEM39683	SEM Self Etching Gray Primer ( 8 oz ) Aerosol <sup>8</sup>	0.015	50%	Aerosol Spray Can
SUNDRIES:	Transtar 1K Self-Etching Primer ( 8 oz ) Aerosol <sup>8</sup>	0.002	50%	Aerosol Spray Can
<b>Clean up operation</b>				
Jones-Blair:JB21092/01	JB Universal Thinner - 1-Gallon <sup>1</sup>	0.036	100%	Paint gun & hose cleanup rinse
MOR10005/05	Advantage Virgin Lacquer Thinner <sup>2</sup>	0.097	100%	Paint gun & hose cleanup rinse
MOR15015/55	General Purpose Clean-Up Thinner <sup>2</sup>	0.621	100%	Paint gun & hose cleanup rinse
PAS71611	GAL Denatured Alcohol <sup>2</sup>	0.004	100%	Wiping
<b>Body Fillers and Misc Products</b>				
1414	Top Gun 200 Sil Acrylic Caulk - White <sup>3</sup> ( 12 oz tube )	0.009	100%	caulking gun
USC21330	Feather Rite Body Filler <sup>2</sup> ( 1 Gallon Can)	0.022	100%	Hand Squeegee
USC26006	Icing Putty - 24 oz. Tube <sup>5</sup>	0.003	100%	Hand Squeegee
USC32035	Red Glazing Spot Putty - 1 LB Tube <sup>6</sup>	0.006	100%	Hand Squeegee
SC0269 124	Alumi Elastic Sealing Compound <sup>4</sup>	0.004	100%	caulking gun

- 1 Thinner, Reducers , Activators , and Accelerators added in small amounts to paint mix according to temperature and humidity
- 2 Thinner used for clean up of paint equipment
- 3 Caulk used to caulk weep holes in doubler pads - only applied to painted bottles and trailers
- 4 Anti Dielectric Corrosion agent for Aluminum to Steel Joints
- 5 Body filler products to improve aesthetic appearances -- used only as required.
- 6 Used to clean surface oil prior to paint -- Spot use only
- 7 Touch up paint used to repair scratches in paint
- 8 Used to spot treat Aluminum parts

**Volatile Organic Compounds (VOC) , Particulate Matter (PM) and HAPs**

Primary type surface	Coating Name	Gallons/	Uncontrolled				Controlled	VOC	VOC	VOC	Toluene	Methanol	MIBK	Xylenes	Ethyl Benzene	Total HAPs
			PM	PM	PM-10	PM/PM10										
Coated	Coating Name	Hour	lbs/hr	tons/yr	tons/yr	PM/PM10	lbs/hr	lbs/day	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
<b>Touch up/repair operation</b>																
PPG:Q1390-9053	Air Products Green Aerosol Can <sup>7</sup>	0.011	0.006	0.025	0.025	0.000	0.058	1.390	0.254	0.000	0.000	0.000	0.049	0.015	0.064	
SEM39683	SEM Self Etching Gray Primer ( 8 oz ) Aerosol <sup>8</sup>	0.015	0.000	0.084	0.084	0.000	0.056	1.333	0.243	0.041	0.000	0.000	0.010	0.000	0.052	
SUNDRIES:	Transtar 1K Self-Etching Primer ( 8 oz ) Aerosol <sup>8</sup>	0.002	0.000	0.005	0.005	0.002	0.008	0.196	0.036	0.002	0.000	0.000	0.000	0.000	0.002	
<b>Clean up operation</b>																
Jones-Blair:JB21092/01	JB Universal Thinner - 1-Gallon <sup>1</sup>	0.036	0.000	0.000	0.000	0.000	0.26	6.23	1.14	0.000	0.000	0.000	0.000	0.000	0.000	
MOR10005/05	Advantage Virgin Lacquer Thinner <sup>2</sup>	0.097	0.000	0.000	0.000	0.001	0.67	16.03	2.93	2.048	0.878	0.000	0.000	0.000	2.925	
MOR15015/55	General Purpose Clean-Up Thinner <sup>2</sup>	0.621	0.000	0.000	0.000	0.000	4.42	106.02	19.35	5.805	5.805	0.920	0.000	0.000	12.529	
PAS71611	GAL Denatured Alcohol <sup>2</sup>	0.004	0.000	0.000	0.000	0.000	0.03	0.70	0.13	0.000	0.006	0.000	0.000	0.000	0.006	
<b>Body Fillers and Misc Products</b>																
1414	Top Gun 200 Sil Acrylic Caulk - White <sup>3</sup> ( 12 oz tube )	0.009	0.000	0.000	0.000	0.000	0.038	0.904	0.165	0.000	0.000	0.000	0.000	0.000	0.000	
USC21330	Feather Rite Body Filler <sup>2</sup> ( 1 Gallon Can)	0.022	0.000	0.000	0.000	0.000	0.038	0.910	0.166	0.000	0.000	0.000	0.000	0.000	0.000	
USC26006	Icing Putty - 24 oz. Tube <sup>5</sup>	0.003	0.000	0.000	0.000	0.000	0.008	0.198	0.036	0.000	0.000	0.000	0.000	0.000	0.000	
USC32035	Red Glazing Spot Putty - 1 LB Tube <sup>6</sup>	0.006	0.000	0.000	0.000	0.000	0.022	0.537	0.098	0.051	0.000	0.000	0.017	0.000	0.068	
SC0269 124	Alumi Elastic Sealing Compound <sup>4</sup>	0.004	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
<b>Total</b>	<b>PTE PM, VOC and HAPs</b>		<b>0.006</b>	<b>0.11</b>	<b>0.11</b>	<b>0.00</b>	<b>5.60</b>	<b>134.44</b>	<b>24.54</b>	<b>7.95</b>	<b>6.69</b>	<b>0.92</b>	<b>0.08</b>	<b>0.02</b>	<b>15.646</b>	

**NOTES: touch-up, clean-up and repair emissions in the North and the South paint booths (VOC and Particulate Emissions are for both booths) are combined.**

**The emissions are divided into half to apply towards each booth.**

1. Emissions are based upon a maximum of 0.089 vehicles per hour.
2. Fabric filter media captures 73% of all particles 5-6 microns in size and 100 % of all particles 15 microns and larger - manufacturers rated efficiency
3. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

**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)  
HAP lbs/hr = (gallons/hr) x (lbs/gal) x (% HAP/100%)

**Appendix A: Emissions Calculations  
Particulate  
Surface Prep operation (SP) North and South paint Booths**

**Company Name: Alloy Custom products  
Address City IN Zip: 9701 SR 25 North, Lafayette, IN 47905  
FESOP Renewal No.: 157-28184-00461  
Reviewer: Swarna Prabha**

Paint Booths, Surface Preparation (SP)\*

Product Id	Name	Gallons/ Hour	Transfer Efficiency	Density (lbs/gal)	Weight % Solids	Solids (lbs/gal)	10 %Solids (lbs/gal)
381761	Jones-Blair:JB33304/01	0.6480	74%	12.1	74.8%	9.07	0.91
381762	Jones-Blair:JB99953/04	0.6480	74%	12.7	70.9%	9.03	0.90
399093	Jones-Blair:JB45070/01	0.6480	74%	10.5	65.2%	6.86	0.69
390836	Jones-Blair:JB99951/04	0.2160	74%	9.5	90.0%	8.55	0.86
390837	Jones-Blair:JB45072/01	0.2938	74%	8.3	52.4%	4.35	0.43
390838	Jones-Blair:JB99951/04	0.0972	74%	9.5	90.0%	8.55	0.86

Emission Unit	Name	Uncontrolled PTE				Controlled PTE			
		PM lb/hr	PM-10 lb/hr	PM ton/year	PM-10 ton/year	PM lb/hr	PM-10 lb/hr	PM ton/year	PM-10 ton/year
PB1 & P4	Jones-Blair:JB33304/01	0.435	0.435	1.906	1.906	0.0004	0.1131	0.002	0.495
PB1 & P4	Jones-Blair:JB99953/04	0.433	0.433	1.896	1.896	0.0004	0.1125	0.002	0.493
PB1 & P4	Jones-Blair:JB45070/01	0.329	0.329	1.441	1.441	0.0003	0.0855	0.001	0.375
PB1 & P4	Jones-Blair:JB99951/04	0.137	0.137	0.599	0.599	0.0001	0.0355	0.001	0.156
PB1 & P4	Jones-Blair:JB45072/01	0.095	0.095	0.414	0.414	0.0001	0.0246	0.000	0.108
PB1 & P4	Jones-Blair:JB99951/04	0.061	0.061	0.269	0.269	0.0001	0.0160	0.000	0.070
	<b>Total</b>	<b>1.49</b>	<b>1.49</b>	<b>6.52</b>	<b>6.52</b>	<b>0.001</b>	<b>0.387</b>	<b>0.007</b>	<b>1.70</b>

**NOTES: Surface preparation operation is performed in the North and the South paint booths ( particulate Emissions are for both booths combined and are divided into half to apply towards each booth.)**

- \*Emissions are conservatively estimated by assuming the maximum amount of material removed from the vehicles is equal to 10% of the amount of solids in surface coatings that are applied to the painted exterior surfaces of the vehicles.
- Emissions are based upon a maximum of 0.086 vehicles per hour for both booths.  
At a process rate of 0.086 vehicles per hour the material process rate for surface preparation averages 1720 lbs/hour.
- Fabric filter media captures 73% of all particles 5-6 microns in size and 100 % of all particles 15 microns and larger - manufacturers rated efficiency. Based on this the filter efficiency for PM10 and PM2.5 is assumed to be 73% and PM is 99.9%
- There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

**Methodology:**

PM = PM10 lbs/hr = (gals/hr) x (lbs solids/gal) x (%Transfer Efficiency/100%)

PM = PM10 (after controls) tons/yr = [(lbs/hr) x ((100-%filter efficiency)/100)\* [(8760 hrs/yr)/[2000lbs/ton]]



**Appendix A: Emissions Calculations**

**VOCs, Particulate, HAPs**

**Natural Gas Combustion**

**MM BTU/HR <100**

Company Name: Alloy Custom Products  
 Address City IN Zip: 9701 SR 25 North, Lafayette, IN 47905  
 Permit Number: 157-28184-00461  
 Reviewer: Swarna Prabha

Pollutant	PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	0.6	100	5.5	84.0
Lo Nox Emission Factor (lb/MMCF)				50		

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission					
					tons/year	tons/year	tons/year	tons/year	tons/year	tons/year
					PM*	PM10*	SO2	NOx**	VOC	CO
Air Make-up Unit-South Booth	1	3.400	3.400	29.78	0.028	0.11	0.009	1.5	0.082	1.3
Air Make-up Heater -North booth	1	1.878	1.878	16.45	0.016	0.06	0.005	0.4	0.045	0.7
Space Heaters Various Locations	16	0.250	4.000	35.04	0.033	0.13	0.011	1.8	0.096	1.5
Space Heater Various Locations	3	0.300	0.900	7.88	0.007	0.03	0.002	0.4	0.022	0.3
Spcat Heater Office	2	0.200	0.400	3.50	0.003	0.01	0.001	0.2	0.010	0.1
<b>Totals</b>	<b>23</b>		<b>10.578</b>	<b>92.7</b>	<b>0.09</b>	<b>0.35</b>	<b>0.03</b>	<b>4.22</b>	<b>0.25</b>	<b>3.89</b>

Pollutant	Benzene	Formaldehyde	Hexane	Toluene	Cd	Cr	Ni
Emission Factor (lb/MMCF)	2.1E-03	7.5E-02	1.8E+00	3.4E-03	1.1E-03	1.4E-03	2.1E-03

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission						
					tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
					Benzene	Formaldehyde	Hexane	Toluene	Cd	Cr	Ni
Air Make-up Unit-South Booth	1	3.400	3.400	29.78	3.1E-05	1.1E-03	2.7E-02	5.1E-05	1.6E-05	2.1E-05	3.1E-05
Air Make-up Heater -North booth	1	1.878	1.878	16.45	1.7E-05	6.2E-04	1.5E-02	2.8E-05	9.0E-06	1.2E-05	1.7E-05
Space Heaters Various Locations	16	0.250	4.000	35.04	3.7E-05	1.3E-03	3.2E-02	6.0E-05	1.9E-05	2.5E-05	3.7E-05
Space Heater Various Locations	3	0.300	0.900	7.88	8.3E-06	3.0E-04	7.1E-03	1.3E-05	4.3E-06	5.5E-06	8.3E-06
Spcat Heater Office	2	0.200	0.400	3.50	3.7E-06	1.3E-04	3.2E-03	6.0E-06	1.9E-06	2.5E-06	3.7E-06
<b>Totals</b>	<b>23</b>		<b>10.578</b>	<b>92.663</b>	<b>0.00010</b>	<b>0.00347</b>	<b>0.08340</b>	<b>0.00016</b>	<b>0.00005</b>	<b>0.00006</b>	<b>0.00010</b>

- \*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
- There is no PM2.5 Emission Factor in AP-42, PM10 = PM2.5
- \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
- The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Methodology**

Potential Throughput (MMCF) = Combined Total Heat Input Capacity (MMBtu/hr) \* 8,760 hrs/yr \* 1 MMCF/1,000 MMBtu

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

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)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

**Abbreviations**

PM = Particulate Matter	NOx = Nitrous Oxides	Cr = Chromium
PM10 = Particulate Matter (<10 um)	VOC - Volatile Organic Compounds	Ni = Nickel
SO2 = Sulfur Dioxide	CO = Carbon Monoxide	Cd = Cadmium



# 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: Everett Snoeberger  
Alloy Custom Products  
9701 State Road 25 N  
Lafayette, IN 47905-9734

DATE: Dec. 22, 2009

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

SUBJECT: Final Decision  
FESOP  
157-28184-00461

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

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

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

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

Dec. 22, 2009

TO: Delphi Public Library

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

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

**Applicant Name: Alloy Custom Products**  
**Permit Number: 157-28184-00461**

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	CDENNY 12/22/2009 Allov Custom Products 157-28184-00461 (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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Everett Snoeberger Alloy Custom Products 9701 State Road 25 N Lafayette IN 47905-9734 (Source CAATS)										
2		Ms. Anna Cicirelli P.O. Box 289, 102 Tipton Street Battleground IN 47920 (Affected Party)										
3		Delphi Public Library 222 E Main St Delphi IN 46923-1593 (Library)										
4		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
5		Tippecanoe County Commissioners 20 N 3rd St, County Office Building Lafayette IN 47901 (Local Official)										
6		Tippecanoe County Health Department 20 N. 3rd St Lafayette IN 47901-1211 (Health Department)										
7		Lafayette City Council and Mayors Office 20 North 6th Street Lafayette IN 47901-1411 (Local Official)										
8		Ms. Sharon McKnight 909 Southernview Drive North Lafayette IN 47909 (Affected Party)										
9		Ms. Dorothy Whicker 2700 Bonny Lane Lafayette IN 47904 (Affected Party)										
10		Tom Pierce Sr. 2029 Hall Street Lafayette IN 47904 (Affected Party)										
11		Ms. Geneva Werner 3212 Longlois Drive Lafayette IN 47904-1718 (Affected Party)										
12		Mr. Thomas Ruzicka 3509 Pine Lane Lafayette IN 47905 (Affected Party)										
13		Mrs. Phyllis Owens 3600 Cypress Lane Lafayette IN 47905 (Affected Party)										
14		Mr. Jerry White 1901 King Eider Ct West Lafayette IN 47906 (Affected Party)										
15		Ms. Rose Filley 5839 Lookout Drive West Lafayette IN 47906 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		William 128 Seminole Drive West Lafayette IN 47906 (Affected Party)										
2		Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 (Affected Party)										
3		Shadeland Town Council 3125 South 175 West Lafayette IN 47905 (Local Official)										
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10												
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