



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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)

for Lyon Workspace Products, LLC in LaPorte County

Permit No. F091-28235-00139

The Indiana Department of Environmental Management (IDEM) has received an application from Lyon Workspace Products, LLC, located at 1000 West Barker Ave, Michigan City, for a New Source Construction and FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Lyon Workspace Products, LLC to operate an existing stationary steel locker manufacturing and coating operation.

The applicant intends to operate existing equipment that will emit air pollutants; therefore the permit contains new permit conditions. The potential to emit criteria pollutants and hazardous air pollutants will be less than the Title V major threshold levels. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to continue to operate the existing source.

IDEM is aware that the steel locker manufacturing and coating operation has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft FESOP contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Michigan City Public Library
100 East 4th St.
Michigan City, Indiana 46360

and

Northwest Regional Office
8380 Louisiana Street
Merrillville, Indiana 46410

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F091-28235-00139 in all correspondence.

Comments should be sent to:

Meredith Jones
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5176
Or dial directly: (317) 234-5176
E-mail: MJones@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM public file room on the 12th floor of the Indiana Government Center North (100 N. Senate Avenue, Indianapolis, Indiana 46204-2251), and at the IDEM Northwest Regional Office (8380 Louisiana Street, Merrillville, Indiana 46410).

If you have any questions please contact Meredith Jones of my staff at the above address.



Alfred C. Dumauval, Ph. D., Section Chief
Permits Branch
Office of Air Quality



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DRAFT

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

**Lyon Workspace Products, LLC
1000 West Barker Ave
Michigan City, Indiana 46360**

(herein known as the Permittee) is hereby authorized to construct and 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.

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.: F091-28235-00139	
Issued by:	Issuance Date:
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-8-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]	
B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5 Term of Conditions [326 IAC 2-1.1-9.5]	
B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.7 Severability [326 IAC 2-8-4(4)]	
B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.14 Emergency Provisions [326 IAC 2-8-12]	
B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
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]	
B.18 Permit Renewal [326 IAC 2-8-3(h)]	
B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.21 Source Modification Requirement [326 IAC 2-8-11.1]	
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]	
B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
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]	
B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS.....	16
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]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
C.8 Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

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)]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

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

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23

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

- D.1.1 FESOP Limit [326 IAC 2-8]
- D.1.2 Particulate [326 IAC 6-3-2]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.4 Particulate Control

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

- D.1.5 Parametric Monitoring

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

- D.1.6 Record Keeping Requirements
- D.1.7 Reporting Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 26

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

- D.2.1 Particulate [326 IAC 6-2-4]

Certification Form..... 27
Emergency Occurrence Form..... 28
Quarterly Report Form 30
Quarterly Deviation and Compliance Monitoring Report Form..... 31
Affidavit of Construction 33

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)]

The Permittee owns and operates a stationary steel locker manufacturing and coating operation.

Source Address:	1000 West Barker Ave, Michigan City, Indiana 46360
General Source Phone Number:	(219) 872-7238
SIC Code:	2542
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD 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)]

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

- (a) One (1) powder coating line, located in the Environmental Room (a segregated, interior room), installed in 2005, approved for construction in 2011, with a maximum powder usage of 120.0 lbs/hr. The one (1) powder coating line consists of:
- (1) One (1) manual spray booth, identified as PC-1, used to apply small runs of special colored powder, installed in 2005, approved for construction in 2011, using a Torit Downflo canister filter assembly, identified as PCF-1, as particulate control, and exhausting indoors.
- The Torit Downflo canister filter assembly consists of two (2) vacuum systems, each routed to twelve (12) filter canisters. This assembly is located in the Environmental Room and returns filtered air back into the room.
- (2) One (1) Nordson Excel 2000 spray booth, identified as PC-2, with three (3) inserts, primarily used to apply gray, putty, and blue colored powders, installed in 2009, approved for construction in 2011, equipped with twelve (12) automated Versa spray guns, using Nordson PowerGrid cartridge filters as particulate control, and exhausting indoors. Inserts may be occasionally cleaned out for use with special colors to minimize waste.

The Environmental Room is not equipped with a stack and does not have the ability to exhaust outdoors at this time.

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:

- (a) Five (5) MIG welders, identified as MIG-1 through MIG-5, constructed in 1996, 2005, 1996, 2005, and 1996, respectively, each with a maximum rod consumption of 1.3 lbs/hr,

and with MIG-1 through MIG-4 exhausting to stacks MIGX-1 through MIGX-4, respectively. Welder MIG-5 exhausts indoors.

- (b) Three (3) TIG welders, identified as TIG-1 through TIG-3, all constructed in 1996, each with a maximum rod consumption of 1.3 lbs/hr, and exhausting indoors.
- (c) One (1) arc welder, identified as Arc-1, constructed in 1996, with a maximum rod consumption of 1.3 lbs/hr, and exhausting indoors.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour (MMBtu/hr):
 - (1) Five (5) Thermo-Cycler comfort heaters, identified as TC-1 through TC-5, each with a maximum capacity of 0.58 MMBtu/hr, all constructed before 1996, and exhausting to stacks TCX-1 through TCX-5, respectively.
 - (2) One (1) hot water washer boiler, identified as WB-1, with a maximum capacity of 3.0 MMBtu/hr, constructed before 1996, and exhausting to stack WBX-1.
 - (3) One (1) dry off oven, identified as DOO-1, with a maximum capacity of 2.0 MMBtu/hr, constructed before 1996, and exhausting to stack DOOX-1.
 - (4) One (1) curing oven, identified as CO-1, with a maximum capacity of 3.5 MMBtu/hr, constructed before 1996, and exhausting to stack COX-1.
 - (5) One (1) burn off oven, identified as BO-1, with a maximum capacity of 0.78 MMBtu/hr, constructed before 1996, and exhausting to stack BOX-1.
- (e) Manufacturing equipment that is pneumatically or electrically operated, including seventeen (17) brake presses, eighteen (18) punch presses, four (4) roller formers, two (2) sheer presses, and one (1) coil line, all exhausting indoors.
- (f) One (1) maintenance shop, exhausting indoors.

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]

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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)][326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when 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 described in the application or the permit. The emission units covered in this permit may continue operating on and after the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue 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.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F091-28235-00139, 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.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

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.7 Severability [326 IAC 2-8-4(4)]

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.8 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.9 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. 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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent, 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.11 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 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.13 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) no later than 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 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, or Northwest Regional Office 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 Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F091-28235-00139 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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.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]

- (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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 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)]

- (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 a

certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, pursuant to 326 IAC 2-8-3(g), 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]

- (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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.
- (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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.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 no later than 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 two hundred fifty (250) 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 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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]

- (a) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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]

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)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

- (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

no later than 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.13 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
- (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.15 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.16 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

- (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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that

meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

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 applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) powder coating line, located in the Environmental Room (a segregated, interior room), installed in 2005, approved for construction in 2011, with a maximum powder usage of 120.0 lbs/hr. The one (1) powder coating line consists of:

(1) One (1) manual spray booth, identified as PC-1, used to apply small runs of special colored powder, installed in 2005, approved for construction in 2011, using a Torit Downflo canister filter assembly, identified as PCF-1, as particulate control, and exhausting indoors.

The Torit Downflo canister filter assembly consists of two (2) vacuum systems, each routed to twelve (12) filter canisters. This assembly is located in the Environmental Room and returns filtered air back into the room.

(2) One (1) Nordson Excel 2000 spray booth, identified as PC-2, with three (3) inserts, primarily used to apply gray, putty, and blue colored powders, installed in 2009, approved for construction in 2011, equipped with twelve (12) automated Versa spray guns, using Nordson PowerGrid cartridge filters as particulate control, and exhausting indoors. Inserts may be occasionally cleaned out for use with special colors to minimize waste.

The Environmental Room is not equipped with a stack and does not have the ability to exhaust outdoors at this time.

(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 FESOP Limit [326 IAC 2-8]

Pursuant to 326 IAC 2-8, the total powder throughput to the one (1) powder coating line shall not exceed 446,760 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit PM_{10} from all other emission units at this source, shall limit the source-wide total potential to emit PM_{10} to less than 100 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) powder coating line shall not exceed 10.85 pounds per hour when operating at a process weight rate of 4.275 tons per hour.

The pound per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Condition D.1.2, the Torit Downflo canister filter assembly, identified as PC-1, for particulate control shall be in operation and control emissions from the one (1) manual spray booth, identified as PC-1, at all times that PC-1 is in operation and the Nordson PowerGrid cartridge filters shall be in operation and control emissions from the one (1) Nordson Excel 2000 spray booth, identified as PC-2, at all times that PC-2 is in operation.

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

D.1.5 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the Torit Downflo canister filter assembly, identified as PCF-1, at least once per day when the manual spray booth is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across the final filter of the Nordson PowerGrid cartridge filters, at least once per day when the Nordson Excel 2000 spray booth is in operation. When for any one reading, the pressure reading on the dial exceeds the normal range of 1 to 3 on the indicator dial or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that exceeds the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instruments 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 or replaced at least once every six (6) months.

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records of the total amount of powder sprayed in the one (1) powder coating line on a monthly basis.
- (b) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the pressure drop across the Torit Downflo canister filter assembly controlling the manual spray booth and the final filter of the Nordson PowerGrid cartridge filters controlling the Nordson Excel 2000 spray booth. 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, (i.e., the process did not operate that day).

- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.7 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 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, no later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour (MMBtu/hr):
- (2) One (1) hot water washer boiler, identified as WB-1, with a maximum capacity of 3.0 MMBtu/hr, constructed before 1996, and exhausting to stack WBX-1.

(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 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating), the particulate emissions from the one (1) hot water washer boiler, identified as WB-1, shall be limited by the following equation:

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

Where:

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

The particulate emissions from the one (1) hot water washer boiler, identified as WB-1, shall not exceed 0.57 pounds of particulate per MMBtu.

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

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

Source Name: Lyon Workspace Products, LLC
Source Address: 1000 West Barker Ave, Michigan City, Indiana 46360
FESOP Permit No.: F091-28235-00139

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: Lyon Workspace Products, LLC
Source Address: 1000 West Barker Ave, Michigan City, Indiana 46360
FESOP Permit No.: F091-28235-00139

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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: _____

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

FESOP Quarterly Report

Source Name: Lyon Workspace Products, LLC
Source Address: 1000 West Barker Ave, Michigan City, Indiana 46360
FESOP Permit No.: F091-28235-00139
Facility: powder coating line: one (1) manual spray booth, identified as PC-1, and one (1) Nordson Excel 2000 spray booth, identified as PC-2
Parameter: total powder throughput
Limit: shall not exceed 446,760 pounds per twelve (12) consecutive month period

YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**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: Lyon Workspace Products, LLC
 Source Address: 1000 West Barker Ave, Michigan City, Indiana 46360
 FESOP Permit No.: F091-28235-00139

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Lyon Workspace Products, LLC
1000 West Barker Ave
Michigan City, Indiana 46360

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 Lyon Workspace Products, LLC 1000 West Barker Ave, Michigan City, Indiana 46360, the construction of the steel locker manufacturing and coating operation referenced in this permit was as stated in the permit application, received by the Office of Air Quality on July 20, 2009 and as permitted pursuant to New Source Construction and Federally Enforceable State Operating Permit No. F091-28235-00139, Plant ID No. 091-00139 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 State Operating Permit (FESOP)

Source Description and Location

Source Name: Lyon Workspace Products, LLC
Source Location: 1000 West Barker Ave, Michigan City, IN 46360
County: LaPorte
SIC Code: 2542
Operation Permit No.: F091-28235-00139
Permit Reviewer: Meredith W. Jones

On July 20, 2009, the Office of Air Quality (OAQ) received an application from Lyon Workspace Products, LLC related to the operation of an existing stationary steel locker manufacturing and coating operation.

Existing Approvals

This source was previously operated as a steel pallet rack manufacturing operation by Paltier, Inc. at 1701 Kentucky St, Michigan City, Indiana 46360. Paltier, Inc. was issued Registration No. R091-9464-00015 on May 15, 1998. After Paltier, Inc. ceased operations, Lyon Workspace Products, LLC purchased the property and constructed new equipment to perform a different manufacturing process. There have been no approvals issued to this source since it was purchased by Lyon Workspace Products, LLC.

County Attainment Status

The source is located in LaPorte County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective November 15, 1990, for the 1-hour standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (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. LaPorte 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) *PM_{2.5}*
LaPorte County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions and the effective date of these rules was July 15, 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 PM_{2.5} emissions until 326 IAC 2-2 is revised.

(c) *Other Criteria Pollutants*

LaPorte 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:

(a) One (1) powder coating line, located in the Environmental Room (a segregated, interior room), installed in 2005, approved for construction in 2011, with a maximum powder usage of 120.0 lbs/hr. The one (1) powder coating line consists of:

(1) One (1) manual spray booth, identified as PC-1, used to apply small runs of special colored powder, installed in 2005, approved for construction in 2011, using a Torit Downflo canister filter assembly, identified as PCF-1, as particulate control, and exhausting indoors.

The Torit Downflo canister filter assembly consists of two (2) vacuum systems, each routed to twelve (12) filter canisters. This assembly is located in the Environmental Room and returns filtered air back into the room.

(2) One (1) Nordson Excel 2000 spray booth, identified as PC-2, with three (3) inserts, primarily used to apply gray, putty, and blue colored powders, installed in 2009, approved for construction in 2011, equipped with twelve (12) automated Versa spray guns, using Nordson PowerGrid cartridge filters as particulate control, and exhausting indoors. Inserts may be occasionally cleaned out for use with special colors to minimize waste.

The Environmental Room is not equipped with a stack and does not have the ability to exhaust outdoors at this time.

(b) Five (5) MIG welders, identified as MIG-1 through MIG-5, constructed in 1996, 2005, 1996, 2005, and 1996, respectively, each with a maximum rod consumption of 1.3 lbs/hr, and with MIG-1 through MIG-4 exhausting to stacks MIGX-1 through MIGX-4, respectively. Welder MIG-5 exhausts indoors.

(c) Three (3) TIG welders, identified as TIG-1 through TIG-3, all constructed in 1996, each with a maximum rod consumption of 1.3 lbs/hr, and exhausting indoors.

(d) One (1) arc welder, identified as Arc-1, constructed in 1996, with a maximum rod consumption of 1.3 lbs/hr, and exhausting indoors.

(e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour (MMBtu/hr):

- (1) Five (5) Thermo-Cycler comfort heaters, identified as TC-1 through TC-5, each with a maximum capacity of 0.58 MMBtu/hr, all constructed before 1996, and exhausting to stacks TCX-1 through TCX-5, respectively.
- (2) One (1) hot water washer boiler, identified as WB-1, with a maximum capacity of 3.0 MMBtu/hr, constructed before 1996, and exhausting to stack WBX-1.
- (3) One (1) dry off oven, identified as DOO-1, with a maximum capacity of 2.0 MMBtu/hr, constructed before 1996, and exhausting to stack DOOX-1.
- (4) One (1) curing oven, identified as CO-1, with a maximum capacity of 3.5 MMBtu/hr, constructed before 1996, and exhausting to stack COX-1.
- (5) One (1) burn off oven, identified as BO-1, with a maximum capacity of 0.78 MMBtu/hr, constructed before 1996, and exhausting to stack BOX-1.
- (f) Manufacturing equipment that is pneumatically or electrically operated, including seventeen (17) brake presses, eighteen (18) punch presses, four (4) roller formers, two (2) sheer presses, and one (1) coil line, all exhausting indoors.
- (g) One (1) maintenance shop, exhausting indoors.

“Integral Part of the Process” Determination

The applicant has submitted the following information on March 25, 2010 to justify why the Nordson PowerGrid cartridge filters should be considered an integral part of the Nordson Excel 2000 spray booth, identified as PC-2:

- (a) The Nordson PowerGrid cartridge filters capture the overspray from the Nordson Excel 2000 spray booth, allowing the captured powder to be reused.
- (b) The primary reason for installing the Nordson Excel 2000 spray booth, which is equipped with Nordson PowerGrid cartridge filters, was to minimize product waste and reduce operating costs. The booth would have been installed regardless of air quality regulations.
- (c) Based on 2009 figures, Lyon Workspace Products, LLC estimates that the total cost of installing the booth was \$133,400 and that the cost of the gray and putty powders that would have been discarded rather than reused if the booth had not been installed was \$141,228, yielding a benefit of approximately \$7828 as a result of installing the booth. The benefit in future years is anticipated to be greater as the applicant anticipates that the booth will continue to be used for twenty years or more, with an annual operating and maintenance cost of approximately \$2775. Therefore, there is an overwhelming economic advantage to use the Nordson PowerGrid cartridge filters in conjunction with the Nordson Excel 2000 spray booth.

IDEM, OAQ has evaluated the information submitted and agrees that the Nordson PowerGrid cartridge filters should be considered an integral part of the Nordson Excel 2000 spray booth. This determination is based on the fact that there is an overwhelming economic advantage to use the Nordson PowerGrid cartridge filters in conjunction with the Nordson Excel 2000 spray booth. Therefore, the permitting level will be determined using the potential to emit after the Nordson PowerGrid cartridge filters. Operating conditions in the proposed permit will specify that these Nordson PowerGrid cartridge filters shall operate at all times when the Nordson Excel 2000 spray booth is in operation.

At this time, the company has elected to purchase three inserts, which are primarily used for the three most popular colors used at the source: gray, putty, and blue. Lyon Workspace Products, LLC has determined that is not cost effective at this time to purchase any additional color inserts for the Nordson Excel 2000 spray booth. Special colors are run infrequently and are typically applied in the manual spray

booth. The Nordson inserts will be cleaned out and used for special colors when production runs are long enough to justify the cost of a changeover.

Enforcement Issues

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

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

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	<219.92
PM ₁₀ ⁽¹⁾	<220.23
PM _{2.5}	<220.23
SO ₂	0.03
NO _x	5.33
VOC	0.73
CO	4.48

(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."

HAPs	Potential To Emit (tons/year)
Benzene	1.12E-04
Dichlorobenzene	6.40E-05
Formaldehyde	4.00E-03
Hexane	0.10
Toluene	1.81E-04
Lead	2.67E-05
Cadmium	5.87E-05
Chromium	7.47E-05
Manganese	0.09
Nickel	1.12E-04
TOTAL HAPs	0.19

(a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM₁₀ is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year, each. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8) because the source will limit emissions to less than the Title V major source threshold levels.

- (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 less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

PTE 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 of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion (TC-1 through TC-5, WB-1, DOO-1, CO-1, BO-1)	0.10	0.41	0.41	0.03	5.33	0.29	4.48	0.10	0.10 (hexane)
Welding (MIG-1 through MIG-5, TIG-1 through TIG-3, Arc-1)	0.46	0.46	0.46	-	-	-	-	0.09	0.09 (manganese)
Powder Coating Line (PC-1 & PC-2)	13.40	13.40	13.40	-	-	-	-	-	-
Manufacturing Equipment	<4.56	<4.56	<4.56	-	-	0.44	-	negl.	negl.
Maintenance Shop	<4.56	<4.56	<4.56	-	-	negl.	-	negl.	negl.
Total PTE of Entire Source	<23.08	<23.39	<23.39	0.03	5.33	0.73	4.48	0.19	0.10 (hexane)
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 ₁₀), not particulate matter (PM), is considered as a "regulated air pollutant."									

- (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 less than ten (10) tons per year for a single HAP and 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).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

The total powder throughput to the one (1) powder coating line shall not exceed 446,760 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit PM₁₀ from all other emission units at this source, shall limit the source-wide total potential to emit PM₁₀ to less than 100 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

(b) *PSD Minor Source*

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 (40 CFR 60, Subpart D) (326 IAC 12) are not included in the permit for the one (1) hot water washer boiler, identified as WB-1, since this emission unit does not have a heat input rate of more than 250 million British thermal units per hour (MMBtu/hr).
- (b) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Db) (326 IAC 12) are not included in the permit for the one (1) hot water washer boiler, identified as WB-1, since this emission unit does not have a heat input capacity of greater than 100 million British thermal units per hour (MMBtu/hr).
- (c) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) (326 IAC 12) are not included in the permit for the one (1) hot water washer boiler, identified as WB-1, since this emission unit has a maximum design heat input capacity of less than 10 MMBtu/hr.
- (d) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture (40 CFR 60, Subpart EE) (326 IAC 12) are not included in the permit for the one (1) powder coating line since this is not a metal furniture surface coating operation in which organic coatings are applied. Pursuant to 40 CFR 60.331, powder coatings are not included in the definition of organic coatings.
- (e) The requirements of the New Source Performance Standard for Metal Coil Surface Coating (40 CFR 60, Subpart TT) (326 IAC 12) are not included in the permit for the one (1) powder coating line since this is not an affected facility in a metal coil surface coating operation.
- (f) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart Mmmm) (326 IAC 20-80) are not included in the permit for the one (1) powder coating line since this source is not a major source of HAPs.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture (40 CFR Part 63, Subpart Rrrr) (326 IAC 20-78) are not included in the permit for the one (1) powder coating line since this source is not a major source of HAPs.

- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (326 IAC 20-64) are not included in the permit for the one (1) powder coating line since this facility does not perform metal coil surface coating operations and the source is not a major source of HAPs.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart HHHHHH) are not included in the permit for the one (1) powder coating line since this facility is not involved in any of the following activities:
 - (1) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;
 - (2) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;
 - (3) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR Part 63, Subpart XXXXXX) are not included in the permit for the metal fabricating operations since the source is not primarily engaged in any of the operations in the nine source categories listed in 40 CFR 63.11514 (a)(1) through (9) (i.e., it does not operate under any of the NAICS codes listed in 73 FR 43000, July 23, 2008).
- (l) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (m) 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.

State Rule Applicability Determination

The following state rules are applicable to the source:

326 IAC 2-8-4 (FESOP)

FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

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

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

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

This source is not subject to the requirements of 326 IAC 2-4.1 since the unlimited potential to emit of HAPs from the existing units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is located in LaPorte County, it has actual emissions of NO_x and VOC of less than twenty-five (25) tons per year, each, 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.

326 IAC 5-1 (Opacity Limitations)

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

- (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 6-4 (Fugitive Dust Emissions Limitations)

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

Powder Coating

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the one (1) powder coating line shall not exceed 10.85 pounds per hour when operating at a process weight rate of 4.275 tons (8550 pounds) per hour. The pound per hour limitation was calculated with the following equation:

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

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

The Torit Downflo canister filter assembly shall be in operation at all times the one (1) manual spray booth, identified as PC-1, is in operation, and the Nordson PowerGrid cartridge filters shall be in operation at all times the one (1) Nordson Excel 2000 spray booth, identified as PC-2, is in operation in order to comply with this limit.

326 IAC 8-2-6 (Metal Furniture Coating Operations)

The one (1) powder coating line is not subject to the requirements of 326 IAC 8-2-6 (Metal Furniture Coating Operations) because the powder coating operations do not have the potential to emit VOC.

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

The one (1) powder coating line is not subject to the requirements of (Miscellaneous Metal and Plastic Parts Coating Operations) because the powder coating operations do not have the potential to emit VOC.

Welding

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

The welding operations at the source are not subject to the requirements of 326 IAC 6-3 because less than six hundred twenty-five (625) pounds of rod is consumed per day.

Natural Gas-fired Combustion

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

- (a) The five (5) Thermo-Cycler comfort heaters, identified as TC-1 through TC-5; the one (1) dry off oven, identified as DOO-1; the one (1) curing oven, identified as CO-1; and the one (1) burn off oven, identified as BO-1; are not subject to the requirements of 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating) because none of these emission units are sources of indirect heating.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating), the particulate emissions from the one (1) hot water washer boiler, identified as WB-1, shall be limited by the following equation:

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

Where:

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

$$Pt = \frac{1.09}{(12.18)^{0.26}} = 0.57 \text{ lb/MMBtu}$$

The potential particulate emissions from this boiler is 0.0015 lb/MMBtu. Therefore, this boiler is able to comply with this limit.

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.

Compliance Determination, Monitoring and Testing Requirements

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 determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Torit Downflo canister filter assembly (PCF-1)	1.0 to 3.0 inches of water or a range established during the latest stack test	at least once per day when booth is in operation
final filter of the Nordson PowerGrid cartridge filters	1 to 3 on the indicator dial or a range established during the latest stack test	at least once per day when booth is in operation

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 July 20, 2009.

The operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F091-28235-00139. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Meredith Jones 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) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Company Name: Lyon Workspace Products, LLC
 Address: 1000 West Barker Ave, Michigan City, IN 46360
 Permit No.: F091-28235-00139
 Reviewer: Meredith W. Jones
 Date: 4/19/10

****Potential to Emit Summary****

Criteria Pollutants: Uncontrolled (tons/yr)

Activity (Emission Unit)	PM	PM ₁₀	PM _{2.5}	SOx	NOx	VOC	CO	Total HAPs	Highest Single HAP
Natural Gas Combustion (TC-1 through TC-5, WB-1, DOO-1, CO-1, BO-1)	0.10	0.41	0.41	0.03	5.33	0.29	4.48	0.10	0.10 Hexane
Welding (MIG-1 through MIG-5, TIG-1 through TIG-3, Arc-1)	0.46	0.46	0.46	-	-	-	-	0.09	0.09 Manganese
Powder Coating Line									
Manual Spray Booth (PC-1)	210.24	210.24	210.24	-	-	-	-	-	-
Nordson Excel 2000 Spray Booth (PC-2) ¹	10.51	10.51	10.51	-	-	-	-	-	-
Worst-case PTE*	210.24	210.24	210.24	-	-	-	-	-	-
Manufacturing Equipment	<4.56	<4.56	<4.56	-	-	<2.74	-	-	-
Maintenance Shop	<4.56	<4.56	<4.56	-	-	negl.	-	-	-
Total	<219.92	<220.23	<220.23	0.03	5.33	<3.03	4.48	0.19	0.10 Hexane

¹After controls because controls have been determined by IDEM to be integral.

Criteria Pollutants: Limited (tons/yr)

Activity (Emission Unit)	PM	PM ₁₀	PM _{2.5}	SOx	NOx	VOC	CO	Total HAPs	Highest Single HAP
Natural Gas Combustion (TC-1 through TC-5, WB-1, DOO-1, CO-1, BO-1)	0.10	0.41	0.41	0.03	5.33	0.29	4.48	0.10	0.10 Hexane
Welding (MIG-1 through MIG-5, TIG-1 through TIG-3, Arc-1)	0.46	0.46	0.46	-	-	-	-	0.09	0.09 Manganese
Powder Coating Line									
Manual Spray Booth (PC-1)	89.35	89.35	89.35	-	-	-	-	-	-
Nordson Excel 2000 Spray Booth (PC-2)	4.47	4.47	4.47	-	-	-	-	-	-
Worst-case PTE*	89.35	89.35	89.35	-	-	-	-	-	-
Manufacturing Equipment	<4.56	<4.56	<4.56	-	-	<2.74	-	-	-
Maintenance Shop	<4.56	<4.56	<4.56	-	-	negl.	-	-	-
Total	<99.03	<99.34	<99.34	0.03	5.33	<3.03	4.48	0.19	0.10 Hexane

Criteria Pollutants: Limited & Controlled (tons/yr)

Activity (Emission Unit)	PM	PM ₁₀	PM _{2.5}	SOx	NOx	VOC	CO	Total HAPs	Highest Single HAP
Natural Gas Combustion (TC-1 through TC-5, WB-1, DOO-1, CO-1, BO-1)	0.10	0.41	0.41	0.03	5.33	0.29	4.48	0.10	0.10 Hexane
Welding (MIG-1 through MIG-5, TIG-1 through TIG-3, Arc-1)	0.46	0.46	0.46	-	-	-	-	0.09	0.09 Manganese
Powder Coating Line									
Manual Spray Booth (PC-1)	13.40	13.40	13.40	-	-	-	-	-	-
Nordson Excel 2000 Spray Booth (PC-2)	4.47	4.47	4.47	-	-	-	-	-	-
Worst-case PTE*	13.40	13.40	13.40	-	-	-	-	-	-
Manufacturing Equipment	<4.56	<4.56	<4.56	-	-	<2.74	-	-	-
Maintenance Shop	<4.56	<4.56	<4.56	-	-	negl.	-	-	-
Total	<23.08	<23.39	<23.39	0.03	5.33	0.29	4.48	0.19	0.10 Hexane

*Worst-case potential to emit between the two spray booths; calculations were done so that the PTE of the two booths is mutually exclusive.

Company Name: Lyon Workspace Products, LLC
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Permit No.: F091-28235-00139
Reviewer: Meredith W. Jones
Date: 4/19/10

****Natural Gas Combustion (MMBtu/Hr <100)****

This source contains:

Five (5) Thermo-Cycler comfort heaters (TC-1 through TC-5), each with a heat input capacity of	0.58	MMBtu/hr.
One (1) hot water washer boiler (WB-1), with a heat input capacity of	3.00	MMBtu/hr.
One (1) dry off oven (DOO-1), with a heat input capacity of	2.00	MMBtu/hr.
One (1) curing oven (CO-1), with a heat input capacity of	3.50	MMBtu/hr.
One (1) burn off oven (BO-1), with a heat input capacity of	0.78	MMBtu/hr.

Total Heat Input Capacity (MMBtu/hr) = Total Potential Throughput (MMCF/yr) =

	Pollutant					
	PM*	PM ₁₀ */PM _{2.5}	SO ₂	NO _x **	VOC	CO
<i>Emission Factor (lbs/10⁶ scf)</i>	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emissions (tons/yr)	0.10	0.41	0.03	5.33	0.29	4.48

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

**Emission Factors for NO_x: Uncontrolled = 100; Low NO_x Burner = 50; Low NO_x Burners/Flue gas recirculation = 32

	HAPs: Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
<i>Emission Factor (lbs/10⁶ scf)</i>	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emissions (tons/yr)	1.12E-04	6.40E-05	4.00E-03	0.10	1.81E-04

	HAPs: Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
<i>Emission Factor (lbs/10⁶ scf)</i>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emissions (tons/yr)	2.67E-05	5.87E-05	7.47E-05	2.03E-05	1.12E-04

Total HAPs (tons/yr) = 0.10

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) * (8760 hrs/yr) * (1 MMCF/1000 MMBtu)

Potential Emissions (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lbs/10⁶ scf) * (1 ton/2000 lbs)

Emission Factors are from US EPA's AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2.

The five highest of both organic and metal HAPs emission factors (from US EPA's AP 42, Chapter 1.4, Tables 1.4-2, 1.4-3, and 1.4-4) are provided; additional HAPs emission factors are available in AP 42, Chapter 1.4.

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Address: 1000 West Barker Ave, Michigan City, IN 46360
Permit No.: F091-28235-00139
Reviewer: Meredith W. Jones
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****Welding****

<i>Activity (Emission Unit)</i>	<i>Number of Stations</i>	<i>Maximum Electrode Consumption per Station (lb/hr)</i>	<i>PM/PM₁₀/PM_{2.5} Emission Factor (lb/lb electrode)</i>	<i>Manganese Emission Factor (lb/lb electrode)</i>	<i>PM/PM₁₀/PM_{2.5} Emissions (tons/yr)</i>	<i>Manganese Emissions (tons/yr)</i>
MIG Welding (MIG-1 through MIG-5)	5.0	1.3	0.0055	0.0005	0.157	0.014
TIG Welding (TIG-1 through TIG-3)	3.0	1.3	0.0055	0.0005	0.094	0.009
Arc Welding (Arc-1)	1.0	1.3	0.036	0.011	0.205	0.063
total					0.46	0.09

Methodology

Emissions (tons/yr) = Number of Stations * Maximum Electrode Consumption per Station (lb/hr) * Emission Factor (lb/lb electrode) * (8760 hrs/yr) * (1 ton/2000 lbs)

Emission factors are from an internal IDEM document, "Welding and Flame Cutting". Refer to US EPA's AP 42, Chapter 12.19 for additional emission factors for welding.

Company Name: Lyon Workspace Products, LLC
Address: 1000 West Barker Ave, Michigan City, IN 46360
Permit No.: F091-28235-00139
Reviewer: Meredith W. Jones
Date: 4/19/10

****Powder Coating Line (PC-1 and PC-2)****

<i>Activity (Emission Unit)</i>	<i>Powder Color</i>	<i>Maximum Powder Usage (lbs/hr)</i>	<i>Limited Powder Usage (lbs/hr)</i>	<i>Transfer Efficiency</i>	<i>Control Efficiency</i>	<i>Uncontrolled PM/PM₁₀/PM_{2.5} Emissions (tons/yr)</i>	<i>Controlled PM/PM₁₀/PM_{2.5} Emissions (tons/yr)</i>	<i>Potential PM/PM₁₀/PM_{2.5} Emissions (tons/yr)</i>	<i>Limited PM/PM₁₀/PM_{2.5} Emissions (tons/yr)</i>	<i>Limited & Controlled PM/PM₁₀/PM_{2.5} Emissions (tons/yr)</i>
Manual Spray Booth (PC-	special	120.0	51.0	60.0%	85.0%	210.24	31.54	210.24	89.35	13.40
Nordson Excel 2000 Spray Booth (PC-2)	gray, putty, and blue	120.0	51.0	60.0%	95.0%	210.24	10.51	10.51	4.47	4.47

*The manual spray booth is used only for small runs of special orders.

Worst-Case Potential to Emit (tons/yr) = 210.24 89.35 13.40

Methodology

The control device on the Nordson Excel Spray Booth has been determined by IDEM to be integral to the process.

Uncontrolled PM/PM₁₀/PM_{2.5} Emissions (tons/yr) = Maximum Powder Usage (lb/hr) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Controlled PM/PM₁₀/PM_{2.5} Emissions (tons/yr) = Maximum Powder Usage (lb/hr) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs) * (1 - Control Efficiency)

Limited PM/PM₁₀/PM_{2.5} Emissions (tons/yr) = Limited Powder Usage (lb/hr) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

The limited powder use of 56 lbs/hr is equivalent to 446,760 lbs/yr and was calculated so that PM₁₀ emissions from the entire source are less than 100 tons/yr.



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

April 21, 2011

Mr. Walter Wigley
Lyon Workspace Products
1000 W Barker Ave
Michigan City, IN 46360

Re: Public Notice
Lyon Workspace Products
Permit Level: New Source FESOP
Permit Number: 091 - 28235 - 00139

Dear Mr. Wigley:

Enclosed is a copy of your draft New Source FESOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Laporte County Public Library-Michigan City Branch, 100 East 4th Street in Michigan City IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the News Dispatch in Michigan City, In publish this notice no later than April 27, 2011.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Meredith Jones, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5176 or dial (317) 234-5176.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 21, 2011

News Dispatch
Attn: Classifieds
121 West Michigan Boulevard
Michigan City, In 46360

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Lyon Workspace Products, Laporte County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than April 27, 2011.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: New Source FESOP
Permit Number: 091 - 28235 - 00139

Enclosure
PN Newspaper.dot 3/27/08



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

April 21, 2011

To: Laporte County Public Library-Michigan City Branch

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Lyon Workspace Products
Permit Number: 091 - 28235 - 00139

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08



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Notice of Public Comment

April 21, 2011
Lyon Workspace Products
091 - 28235 - 00139

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

Mail Code 61-53

IDEM Staff	LPOGOST 4/21/2011 Lyon Workspace Products, LLC 091 - 28235 - 00139 (draft)		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	Type of Mail: CERTIFICATE OF MAILING ONLY	

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		Walter Wigley Lyon Workspace Products, LLC 1000 W Barker Ave Michigan City IN 46360 (Source CAATS)										
2		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
3		Laporte County Public Library-Michigan City Branch 100 East 4th Street Michigan City IN 46360-3393 (Library)										
4		LaPorte County Commissioners 555 Michigan Avenue # 202 LaPorte IN 46350 (Local Official)										
5		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
6		Michigan City-City Council and Mayors Office 100 E. Michigan Blvd. Michigan City IN 46360 (Local Official)										
7		LaPorte County Health Department County Complex, 4th Floor, 809 State St. LaPorte IN 46350-3329 (Health Department)										
8		Pottawattamie Park Town Council 500 Marquette Trail Michigan City IN 46360 (Local Official)										
9		Mr. Dick Paulen Barnes & Thornburg 121 W Franklin Street Elkhart IN 46216 (Affected Party)										
10		Mr. Bruce Meerman Mostardi Platt Environmental 1520 Kensington Rd. Suite 204 Oakbrook IL 60523-2139 (Consultant)										
11		Wordwide Industries 1704 S. Kentucky St Michigan City IN 46360 (Affected Party)										
12		Resident 1710 S. Kentucky St Michigan City IN 46360 (Affected Party)										
13		Resident 1724 S. Kentucky St Michigan City IN 46360 (Affected Party)										
14		Resident 713 W. Ferry St Michigan City IN 46360 (Affected Party)										
15		Winn Machine 1808 S. Kentucky St Michigan City IN 46360 (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 Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual 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		Central Services of Michigan City 1801 S. Kentucky St. Michigan City IN 46360 (Affected Party)										
2		Sandusky Abrasives 1100 W. Barker Ave. Michigan City IN 46360 (Affected Party)										
3		Michigan City Paper Box 1100 W. Barker Ave. Michigan City IN 46360 (Affected Party)										
4		Ready Transportation 1100 W. Barker Ave Michigan City IN 46360 (Affected Party)										
5		Michigan City Baking 502 W. US Hwy 20 Michigan City IN 46360 (Affected Party)										
6		Daniel Everson Eastman & Smith, Ltd. One SeaGate, 24th Fl P.O. Box 10032 Toledo OH 43699-0032 (Affected Party)										
7		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
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