



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 6, 2009

RE: Draper, Inc / 065-28477-00029

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Charles V. Baker
Draper, Inc.
411 South Pearl Street
Spiceland, Indiana 47385

January 6, 2010

Re: 065-28477-00029
First Significant Revision to
F065-24217-00029

Dear Charles V. Baker:

Draper Inc., was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F065-24217-00029 on April 7, 2009 for a stationary window coverings and projection screens manufacturing source located at 411 South Pearl Street, Spiceland, Indiana. On September 17, 2009, the Office of Air Quality (OAQ) received an application from the source requesting:

- (a) The removal of all references the paint spray booth identified as EU2;
- (b) The addition of the requirements for 326 IAC 2-8-11 (Fabric and Vinyl Coating) in the permit for all paint spray booths;
- (c) The addition of the requirements for 326 IAC 2-8-12 (Wood Furniture and Cabinet Coating) in the permit for all paint spray booths; and
- (d) The installation of fifteen (15) additional MIG welding stations.

The attached Technical Support Document (TSD) provides additional explanation of the changes to the source. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Anne-Marie C. Hart, of my staff, at 317-234-5174 or 1-800-451-6027, and ask for extension 4-5174.

Sincerely,

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

Attachments: Technical Support Document, revised permit, revised calculations

Draper, Inc.
Spiceland, Indiana
Permit Reviewer: Anne-Marie C. Hart

Page 2 of 2
FESOP SPR No. 065-28477-00029

ACD/ACH

cc: File - Henry County
Henry County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Draper, Inc.
411 South Pearl Street
Spiceland, Indiana 47385**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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.

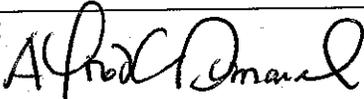
Operation Permit No.: F065-24217-00029	
Original Signed by: Matt Stuckey, Branch Chief Permits Branch Office of Air Quality	Issuance Date: April 7, 2008 Expiration Date: April 7, 2018
First Administrative Amendment No.: 065-27309-00029, issued March 10, 2009	
First Significant Permit Revision No.: 065-28477-00029	
Issued by:  Alfred C. Dumauval, Ph.D, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 6, 2010 Expiration Date: April 7, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary window coverings, projection screens and gymnasium equipment manufacturing source.

Source Address:	411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address:	411 South Pearl Street, Spiceland, Indiana 47385
General Source Phone Number:	765-987-7295
SIC Code:	2591, 3861
County Location:	Henry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) paint spray booth, identified as EU4, constructed in 1995, utilizing an air atomization spray application system, coating a maximum of 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2;
- (b) One (1) paint spray booth, identified as EU8, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;
- (c) One (1) paint spray booth, identified as EU10, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and
- (d) One (1) paint spray booth, identified as EU12, constructed in 2000, utilizing HVLP spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.

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) six (6) natural gas fired make-up units, identified as EU1, rated at 1.0 MMBtu/hr; EU3, rated at 0.8 MMBtu/hr; EU5, rated at 0.8 MMBtu; EU7, rated at 1.0 MMBtu; EU9, rated at 0.8 MMBtu/hr; and EU 11, rated at 0.8 MMBtu/hr. The six (6) natural gas fired make-up units have a total heat input capacity of 5.2 million (MM) British thermal units (Btu) per hour.
- (b) nine (9) natural gas fired air rotation units, each with a heat input capacity of equal to or less than 1.125 MMBtu. The total heat input capacity for the nine (9) natural gas fired air rotation units is 11.9 million (MM) British thermal units (Btu) per hour. [326 IAC 6-2-4]
- (c) twenty one (21) natural gas fired space heaters with a total heat input capacity of 2.45 MMBtu per hour [326 IAC 6-2-4];
- (d) one (1) natural gas fired cure oven, identified as EU13, rated at 4.0 MMBtu/hr, and exhausting through stack S7 [326 IAC 6-2-4];
- (e) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: seventeen (17) metal inert gas welding stations, with maximum wire consumption of 2.72 pounds per hour per station; and
- (f) activities with emissions less than or equal to insignificant thresholds:
 - (1) one (1) powder coating operation, identified as Powder coat system #4, coating a maximum of 0.94 units per hour, utilizing electrostatic application method and pulse max collectors for particulate matter control, and exhausting within the building. [326 IAC 6-3-2]
 - (2) one (1) powder coating operation, identified as Powder coat system #7, coating a maximum of 1.88 units per hour, utilizing electrostatic application method and pulse max collectors for particulate matter control, and exhausting within the building. [326 IAC 6-3-2]

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) to renew 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 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F065-24217-00029, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Severability [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.6 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.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 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.11 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

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

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F065-24217-00029 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.14 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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

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

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

B.16 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 the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this 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.17 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 the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 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 shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.19 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

B.24 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) The 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. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited 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 Accredited 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) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

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

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

by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.13 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]

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

C.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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) 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 the standards for recycling and emissions reduction:

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) paint spray booth, identified as EU4, constructed in 1995, utilizing an air atomization spray application system, coating a maximum of 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2;
- (b) One (1) paint spray booth, identified as EU8, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;
- (c) One (1) paint spray booth, identified as EU10, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and
- (d) One (1) paint spray booth, identified as EU12, constructed in 2000, utilizing HVLP spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 8-2-12][326 IAC 8-2-11]

- (a) The total input of VOC at the four (4) paint spray booths, including but not limited to the input of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.4 tons 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 VOC from other emission units at the source shall limit the VOC emissions from the entire source to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70 Permits) not applicable.

- (b) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the four (4) paint spray booths shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application.

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (c) Pursuant to 326 IAC 8-2-11, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 4.8 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator from a vinyl coating line when coating vinyl.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The total input of toluene at the four (4) paint spray booths shall be less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total input of xylene at the four (4) paint spray booths shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total input of methyl isobutyl ketone (MIBK) at the four (4) paint spray booths shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The total input of any combination of HAPs at the four (4) paint spray booths shall be less than 24.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit HAP from all other emission units at this source, shall limit HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for each single HAP and less than 25 tons per twelve (12) consecutive month period for any combination of HAPs, and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the four (4) paint booths shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP input limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.6 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the respective total volatile organic compound, and single HAP and total HAP input for the most recent twelve (12) month period.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S2, S4, S5 and S6) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount used and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent input records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The total VOC input for each month;
 - (4) The total individual and combined HAP input for each month;
 - (5) Total VOC input for each compliance period; and

- (6) Total input of individual and combined HAPs for each compliance period.
- (b) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of daily filter inspections, weekly overspray observations, once per day and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - Insignificant Activities:

- (a) six (6) natural gas fired make-up units, identified as EU1, rated at 1.0 MMBtu/hr; EU3, rated at 0.8 MMBtu/hr; EU5, rated at 0.8 MMBtu; EU7, rated at 1.0 MMBtu; EU9, rated at 0.8 MMBtu/hr; and EU 11, rated at 0.8 MMBtu/hr. The six (6) natural gas fired make-up units have a total heat input capacity of 5.2 million (MM) British thermal units (Btu) per hour.
- (b) nine (9) natural gas fired air rotation units, each with a heat input capacity of equal to or less than 1.125 MMBtu. The total heat input capacity for the nine (9) natural gas fired air rotation units is 11.9 million (MM) British thermal units (Btu) per hour. [326 IAC 6-2-4]
- (c) twenty one (21) natural gas fired space heaters with a total heat input capacity of 2.45 MMBtu per hour [326 IAC 6-2-4];
- (d) one (1) natural gas fired cure oven, identified as EU13, rated at 4.0 MMBtu/hr, and exhausting through stack S7 [326 IAC 6-2-4];
- (e) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:

seventeen (17) metal inert gas welding stations, with maximum wire consumption of 2.72 pounds per hour per station; and
- (f) activities or categories not previously identified with emissions less than or equal to insignificant thresholds:
 - (1) one (1) powder coating operation, identified as Powder coat system #4, coating a maximum of 0.94 units per hour, utilizing electrostatic application method and pulse max collectors for particulate matter control, and exhausting within the building. [326 IAC 6-3-2]
 - (2) one (1) powder coating operation, identified as Powder coat system #7, coating a maximum of 1.88 units per hour, utilizing electrostatic application method and pulse max collectors for particulate matter control, and exhausting within the building. [326 IAC 6-3-2]

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

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

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), particulate matter (PM) from the powder coating operations, identified as powder coat system #4 and powder coat system #7, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the particulate matter (PM) from a facility with a source maximum operating capacity of less than 10 MMBtu/hr shall not exceed 0.6 lb/MMBtu. PM emissions from the insignificant activities, including the six (6) natural gas fired make-up units, the nine (9) natural gas fired air rotation units, the twenty-one (21) natural gas fired space heaters, and the one (1) natural gas fired cure oven, identified as EU13, shall be limited to 0.60 pounds of particulate matter emitted per million Btu heat input when the total source maximum operating capacity is less than 10 MMBtu/hr.

The following calculation was used to calculate total allowable emissions for each facility:

$$\left(\frac{MMBtu}{hr} \right) \left(\frac{0.60lb}{MMBtu} \right) \left(\frac{8760hrs}{year} \right) \left(\frac{tons}{2000lb} \right)$$

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, IN 47385
FESOP Permit No.: F065-24217-00029

**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: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, IN 47385
FESOP Permit No.: F065-24217-00029

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- 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: _____

A certification is not required for this report.

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

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Four (4) paint spray booths (EU4, EU8, EU10, and EU12)
Parameter: VOC inputs
Limit: Total VOC input at the four (4) paint spray booths, including but not limited to the input of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners, and VOC solvents, shall be limited to less than 99.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	VOC	VOC	VOC
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Four (4) paint spray booths (EU4, EU8, EU10, and EU12)
Parameter: Toluene input
Limit: Total Toluene input at the four (4) paint spray booths shall be limited to less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	Toluene	Toluene	Toluene
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Four (4) paint spray booths (EU4, EU8, EU10, and EU12)
Parameter: Xylene input
Limit: Total Xylene input at the four (4) paint spray booths shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	Xylene	Xylene	Xylene
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Four (4) paint spray booths (EU4, EU8, EU10, and EU12)
Parameter: Methyl isobutyl ketone (MIBK) input
Limit: Total methyl isobutyl ketone (MIBK) input at the four (4) paint spray booths shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	MIBK	MIBK	MIBK
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Four (4) paint spray booths (EU4, EU8, EU10, and EU12)
Parameter: Total of any combination of HAPs input
Limit: Total or any combination of HAPs input at the four (4) paint spray booths shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	Total HAPs	Total HAPs	Total HAPs
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

**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: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, IN 47385
FESOP Permit No.: F065-24217-00029

Months: _____ to _____ Year: _____

Page 1 of 2

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

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location
--

Source Name:	Draper, Inc.
Source Location:	411 South Pearl Street, Spiceland, Indiana 47385
County:	Henry
SIC Code:	2591 and 3861
Operation Permit No.:	F 065-24217-00029
Operation Permit Issuance Date:	April 7, 2008
Significant Permit Revision No.:	065-28477-00029
Permit Reviewer:	Anne-Marie C. Hart

On September 17, 2009, the Office of Air Quality (OAQ) received an application from Draper, Inc. related to a revision to FESOP F065-24217-00029 for an existing stationary window coverings, projection screens and gymnasium equipment manufacturing source.

Existing Approvals

The source was issued FESOP Renewal No. F065-24217-00029 on April 7, 2008. The source has since received the following approvals:

- (a) First Administrative Amendment No. 065-27309-00029, issued on March 10, 2009.

County Attainment Status

The source is located in Henry County.

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

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

- (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. Henry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**
 Henry County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
 Henry County has been classified as attainment or unclassifiable in Indiana for all regulated 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.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.31	0.57	8.66	0.19	0.19 Hexane
Surface Coating Operation	7.69	7.69	7.69	0.00	0.00	<99.40	0.00	<24.81	<10 Toluene
Powder Coating Operation	0.31	0.31	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operation	0.19	0.19	0.19	0.00	0.00	0.00	0.00	0.02	0.02 Manganese
Total PTE of Entire Source	8.39	8.97	8.97	0.06	10.31	<100	8.66	<25	<10
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
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA
negl. = negligible These emissions are based upon Administrative Amendment 065-27309-00029, issued March 10, 2009.									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Draper, Inc. on September 17, 2009, relating to the installation of additional insignificant MIG welding stations, the inclusion of applicable Article 8 rules in the FESOP F065-24217-00029 and the removal of one spray booth.

The following is a list of the new emission units:

- (a) Fifteen (15) metal inert gas welding stations, with a maximum wire consumption of 2.72 pounds per hour per station.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Welding Operation	1.11	1.11	1.11	0.00	0.00	0.00	0.00	0.10	0.10 Manganese
Total PTE of Proposed Revision	1.11	1.11	1.11	0.00	0.00	0.00	0.00	0.10	0.10 Manganese
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g), because the revision involves the inclusion of requirements under 326 IAC 8-2-11 (Fabric and Vinyl Coating) and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) for the surface coating operations, which are under a FESOP VOC limit.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.31	0.57	8.66	0.19	0.19 Hexane
Surface Coating Operation	7.69	7.69	7.69	0.00	0.00	<99.40	0.00	<24.81 <24.52	<10 <9.99 Toluene
Powder Coating Operation	0.31	0.31	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operation	0.19 1.11	0.19 1.11	0.19 1.11	0.00	0.00	0.00	0.00	0.02 0.10	0.02 0.10 Manganese
Total PTE of Entire Source	8.39 9.31	8.97 9.89	8.97 8.89	0.06	10.31	<100	8.66	<25	<10
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
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	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 (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.31	0.57	8.66	0.19	0.19 Hexane
Surface Coating Operation	7.69	7.69	7.69	0.00	0.00	<99.40	0.00	<24.52	<9.99 Toluene
Powder Coating Operation	0.31	0.31	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operation	1.11	1.11	1.11	0.00	0.00	0.00	0.00	0.10	0.10 Manganese
Total PTE of Entire Source	9.31	9.89	8.89	0.06	10.31	<100	8.66	<25	<10
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
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA
negl. = negligible									

- (a) **FESOP Status**
 This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).
- (b) **PSD Minor Source**
 This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

326 IAC 2-8-4 (FESOP)

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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

The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new 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 not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Due to this revision, the source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.

Surface Coating Operations

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

Pursuant to 326 IAC 6-3-2(d), the particulate from the surface coating operation shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The source shall operate the control device in accordance with manufacturer's specifications.

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

Prior to this revision, the spray booths identified as EU4, EU8 and EU10 were not subject to 326 IAC 8-1-6, since they each were limited to less than 25 tons of VOC per year. For this revision, the source has requested to include the requirements of 326 IAC 8-2-11 and 326 IAC 8-2-12 for each of the spray booths (EU4, EU8, EU10 and EU12), since they each can surface coat either vinyl projection screens or wood cases. Since spray booths identified as EU4, EU8 and EU10 will now be subject to 326 IAC 8-2-11 and 326 IAC 8-2-12, they each will no longer be required to limit VOC emissions to less than 25 tons per year.

326 IAC 8-2 (Surface Coating Emission Limitations)

- (a) Prior to this revision, the spray booths identified as EU4, EU8 and EU10 were not subject to 326 IAC 8-2-11, since they each were limited to less than 15 pounds of VOC per day before add-on controls when coating vinyl. For this revision, the source has requested to include the requirements of 326 IAC 8-2-11 and 326 IAC 8-2-12 for each of the spray booths (EU4, EU8, EU10 and EU12), since they each can surface coat either vinyl projection screens or wood cases. Since spray booths identified as EU4, EU8 and EU10 will now be subject to 326 IAC 8-2-11 and 326 IAC 8-2-12, they each will no longer be required to limit VOC emissions to less than 15 pounds of VOC per day before add-on controls when coating vinyl.
- (b) Prior to this revision, spray booth EU12 was only subject to 326 IAC 8-2-12, since it primarily coated wood cases. For this revision, the source has requested to include the requirements of 326 IAC 8-2-11 and 326 IAC 8-2-12 for each of the spray booths (EU4, EU8, EU10 and EU12), since they each can surface coat either vinyl projection screens or wood cases.

326 IAC 8-2-11 (Fabric and Vinyl Coating)

The four (4) surface coating booths (EU4, EU8, EU10 and EU12) were constructed after July 1, 1990, are located in Henry County, could potentially have actual emissions VOC emissions greater than 15 pounds per day and coat vinyl. Pursuant to 326 IAC 8-2-11, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 4.8 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator from a vinyl coating line, when coating vinyl.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This rule applies to facilities located in any county, constructed after July 1, 1990, that perform surface coating of wood furniture (or wood furniture components), including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material.

The four (4) surface coating booths (EU4, EU8, EU10 and EU12) are each subject to the requirements 326 IAC 8-2-12, since they each could potentially have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the four (4) surface coating booths (EU4, EU8, EU10 and EU12), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application

Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Welding Operations

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

Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3 since the potential welding wire usage rate is less than 625 pounds per day.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: F065-24217-00029, issued on April 7, 2008.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) Sections A.2 and A.3 have been revised as follows to reflect the removal of EU2 and the addition of fifteen (15) MIG welding stations:
 - (a) ~~one (1) paint spray booth, identified as EU2, constructed in 1981, utilizing an air atomization spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S1;~~
 - (ba) **One (1) paint spray booth, identified as EU4, constructed in 1995, utilizing an air atomization spray application system, coating a maximum of 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2;**
 - (eb) **One (1) paint spray booth, identified as EU8, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;**
 - (ec) **One (1) paint spray booth, identified as EU10, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and**
 - (ed) **One (1) paint spray booth, identified as EU12, constructed in 2000, utilizing HVLP spray application system, coating a maximum of 6 wood cases ~~per hour~~, 3 metal light bloc frames, or 60 projection screens per hour, using dry filters for particulate matter**

overspray control, and exhausting to one (1) stack, identified as S6.

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:

. . .

- (e) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: ~~two~~ **(2) seventeen (17)** metal inert gas welding stations, with maximum wire consumption of ~~3.92~~ **2.72** pounds per hour per station [326 IAC 6-3-2]; and

. . .

(2) Section D.1 has been revised as follows:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) ~~one (1) paint spray booth, identified as EU2, constructed in 1981, utilizing an air atomization spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S1;~~
- (ba) ~~One (1) paint spray booth, identified as EU4, constructed in 1995, utilizing an air atomization spray application system, coating a maximum of 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2;~~
- (eb) ~~One (1) paint spray booth, identified as EU8, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;~~
- (ec) ~~One (1) paint spray booth, identified as EU10, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and~~
- (ed) ~~One (1) paint spray booth, identified as EU12, constructed in 2000, utilizing HVLP spray application system, coating a maximum of 6 wood cases per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.~~

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 8-2-12][326 IAC 8-2-11]

- (a) The total **input of VOC usage at the five (5) the four (4)** paint spray booths, including but not limited to the **usage input** of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be ~~limited to~~ less than 99.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

~~This usage~~ **Compliance with this limit, combined with including** the potential to emit **VOC from other emission units at the source** for insignificant activities, ~~is required to limit the source-wide potential to emit of~~ **shall limit the VOC emissions from the entire source** to less than 100 tons per twelve (12) consecutive month period **and render 326 IAC 2-7 (Part 70 Permits) not applicable.**

~~Compliance with this limitation shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with this condition shall also make the requirements of 326 IAC 2-2 not applicable to the source.~~

- (b) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in **the four (4)** paint spray booths EU42 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application.

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (c) ~~The daily VOC usage at each of the four (4) paint spray booths, identified as EU2, EU4, EU8 and EU10, must be less than fifteen (15) pounds per day to avoid being subject to 326 IAC 8-2-11. If the VOC usage at any of the four (4) paint spray booths, identified as EU2, EU4, EU8 and EU10, equals or exceeds fifteen (15) pounds per day on a day during which vinyl is being coated in the booth which is at or exceeding the VOC limit, the booth will then be subject to 326 IAC 8-2-11.~~

Pursuant to 326 IAC 8-2-11, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 4.8 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator from a vinyl coating line, when coating vinyl.

~~D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]~~

- ~~(a) The total usage of any single hazardous air pollutant (HAP) at the five (5) paint spray booths shall be limited to less than 10 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(b) The combined usage of all hazardous air pollutants (HAPs) at the five (5) paint spray booths shall be limited to less than 25 tons per twelve (12) consecutive month period. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.~~

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) **The total input of toluene at the four (4) paint spray booths shall be less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

- (b) **The total input of xylene at the four (4) paint spray booths shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (c) **The total input of methyl isobutyl ketone (MIBK) at the four (4) paint spray booths shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (d) **The total input of any combination of HAPs at the four (4) paint spray booths shall be less than 24.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

Compliance with the above limits, combined with the potential to emit HAP from all other emission units at this source, shall limit HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for each single HAP and less than 25 tons per twelve (12) consecutive month period for any combination of HAPs, and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

~~D.1.3 General Reduction Requirements [326 IAC 8-1-6]~~

~~VOC emissions from the three (3) paint spray booths, EU2, EU4, and EU8 shall each be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 not applicable.~~

~~D.1.43 Particulate Matter (PM) [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies) the PM from the five (5) paint spray booths shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~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:~~

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

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

Pursuant to 326 IAC 6-3-2(d), particulate from the four (4) paint booths shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

~~D.1.54 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

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

Compliance Determination Requirements

~~D.1.65 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)~~

~~Compliance with the VOC and HAP usage input limitations contained in Conditions D.1.1 and D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.~~

~~D.1.76 VOC and HAP Emissions~~

~~Compliance with Conditions D.1.1 and D.1.2, D.1.3 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the respective total volatile organic compound, and single HAP and total HAP usages input for the most recent twelve (12) month period.~~

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

~~D.1.8 Particulate [326 IAC 6-3-2(d)]~~

~~Pursuant to and 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.~~

D.1.97 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S4, S5 and S6) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

~~D.1.108~~ Record Keeping Requirements

- (a) To document compliance with Conditions **D.1.1** and D.1.2(a) and (b), ~~D.1.3 and D.1.4~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP **usage input** limits established in Conditions **D.1.1** and D.1.2(a) and (b), ~~D.1.3 and D.1.4~~.
 - (1) The amount used and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The total VOC **usage input** for each month;
 - (4) The total individual and combined HAP **usage input** for each month;
 - (5) Total VOC **usage input** for each compliance period; and
 - (6) Total **usage input** of individual and combined HAPs for each compliance period.
- ~~(b) To document compliance with Condition D.1.2(c), the Permittee shall maintain records in accordance with (1) and (2) below on days during which vinyl is being coated. A notation must be made on days that vinyl is not coated indicating that vinyl was not coated that day. Records maintained for (1) and (2) shall be taken daily and shall be submitted~~

~~quarterly. They shall be complete and sufficient to establish compliance with the VOC limit established in D.1.2(c).~~

~~(1) The daily amount used and VOC content of each coating material and solvent used;~~

~~(2) A log of the dates of use.~~

(eb) To document compliance with Conditions D.1.97 and D.1.408, the Permittee shall maintain a log of **daily filter inspections**, weekly overspray observations, once per day and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(dc) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.449 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions **D.1.1 and D.1.2, D.1.3 and D.1.4 (a)** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(2) Section D.2 has been revised as follows:

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - Insignificant Activities:

. . .

(e) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:

~~two (2)~~ **seventeen (17)** metal inert gas welding stations, with maximum wire consumption of ~~3.92~~ **2.72** pounds per hour per station ~~{326 IAC 6-3-2}~~; and

. . .

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

(3) The report forms have been revised as follows:

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

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385

Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
 FESOP Permit No.: F065-24217-00029
 Facility: ~~Five (5)~~ **Four (4)** paint spray booths (EU2, EU4, EU8, EU10, and EU12)
 Parameter: ~~VOC, single and combined HAPs usages-input~~
 Limit: ~~(a) Total VOC usage input at the five (5) four (4) paint spray booths, including but not limited to the usage input of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners, and VOC solvents, shall be limited to less than 99.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month~~
~~(b) total usage of any single hazardous air pollutant (HAP) at the five (5) paint spray booths shall be limited to less than 10 tons per twelve (12) consecutive month period~~
~~(c) combined usage of all hazardous air pollutants (HAPs) at the five (5) paint spray booths shall be limited to less than 25 tons per twelve (12) consecutive month period~~

YEAR: _____

Month	Total input Usage this Month (tons)			Total Input Usage Previous 11 Months (tons)			Total 12-Month Input Usage (tons)		
	VOC	Single [±] HAP	Combined HAPs	VOC	Single [±] HAP	Combined HAPs	VOC	Single [±] HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

*List the single HAP with the greatest emission rate.

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

**FESOP Quarterly Report
 (Submit Report Quarterly)**

Source Name: Draper, Inc.
 Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
 Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
 FESOP Permit No.: F065-24217-00029
 Facility: **Four (4) paint spray booths (EU4, EU8, EU10, and EU12)**
 Parameter: **Toluene input**
 Limit: **Total Toluene input at the four (4) paint spray booths shall be limited to less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month**

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	Toluene	Toluene	Toluene
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report
 (Submit Report Quarterly)**

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Four (4) paint spray booths (EU4, EU8, EU10, and EU12)
Parameter: Xylene input
Limit: Total Xylene input at the four (4) paint spray booths shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
-------	-------------------------------	---------------------------------------	-----------------------------

	Xylene	Xylene	Xylene
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report
 (Submit Report Quarterly)**

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Four (4) paint spray booths (EU4, EU8, EU10, and EU12)
Parameter: Methyl isobutyl ketone (MIBK) input
Limit: Total methyl isobutyl ketone (MIBK) input at the four (4) paint spray booths shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
		MIBK	MIBK

Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report
 (Submit Report Quarterly)**

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Four (4) paint spray booths (EU4, EU8, EU10, and EU12)
Parameter: Total of any combination of HAPs input
Limit: Total or any combination of HAPs input at the four (4) paint spray booths shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Usage (tons)
	Total HAPs	Total HAPs	Total HAPs
Month 1			

Month 3												
---------	--	--	--	--	--	--	--	--	--	--	--	--

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

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

_____ Attach a signed certification to complete this report.

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

**FESOP Quarterly Report
 (submit one form per booth for each month in the quarter)**

Source Name: _____ Draper, Inc. _____
 Source Address: _____ 411 South Pearl Street, Spiceland, Indiana 47385 _____
 Mailing Address: _____ 411 South Pearl Street, Spiceland, Indiana 47385 _____
 FESOP Permit No.: _____ F065-24217-00029 _____
 Facility: _____ Four (4) paint spray booths (EU2, EU4, EU8, and EU10) _____
 Parameter: _____ VOC _____
 Limit: _____ VOC usage at the four (4) paint spray booths (EU2, EU4, EU8, and EU10) per day when coating vinyl must be below fifteen (15) pounds per day per booth coating vinyl.* _____

_____ Booth: _____ Month: _____

Day	VOC usage	Day	VOC usage
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	

13		29	
14		30	
15		31	
16			

~~*A notation must be made to indicate days on which vinyl was not coated~~

~~_____ No deviation occurred in this quarter.~~

~~_____ Deviation/s occurred in this quarter.~~

~~_____ Deviation has been reported on: _____~~

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

~~_____ Attach a signed certification to complete this report.~~

(4) The source description has been revised as follows:

The Permittee owns and operates a stationary window coverings, ~~and~~ projection screens **and gynasium equipment** manufacturing source.

After further review, IDEM, OAQ, has decided to make the following changes. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

(1) IDEM, OAQ is revising Section B - Emergency Provisions to allow the Permittee to reference a previously reported emergency under paragraph (b)(5) in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Emergency Provisions [326 IAC 2-8-12]

....

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. **Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.**

(2) IDEM has decided to reference 326 IAC 2 in Section B-Source Modification Requirements, rather than specific construction rule.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2-~~and~~ **326 IAC 2-8-11.1.**

(3) The welding operations are not subject to 326 IAC 6-3. Condition D.2.1 has been revised as

follows:

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e), particulate matter (PM) from the powder coating operations, identified as powder coat system #4 and powder coat system #7, shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

- ~~(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from the welding operation not exempt by 326 IAC 6-3-1 or already regulated by 326 IAC 6-3-2(b) through (d), and which has a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.~~

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 September 17, 2009.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 065-28477-00029. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Anne-Marie C. Hart 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) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Calculations

Company Name: Draper, Inc.
 Source Location: 411 South Pearl Street, Spiceland, IN 47385
 Permit Number: 065-28477-00029
 Reviewer: Anne-Marie C. Hart
 Date: October 5, 2009

Uncontrolled/Unlimited Potential Emissions Prior to Revision (tons/year)

Pollutant	Emissions Generating Activity				TOTAL
	Natural Gas Combustion	Surface Coating Operation	Powder Coating Operation	Welding Operation	
PM	0.20	59.15	0.10	0.19	59.6
PM10/PM2.5	0.78	59.15	0.10	0.19	60.2
SO2	0.06	0.00	0.00	0.00	0.1
NOx	10.31	0.00	0.00	0.00	10.3
VOC	0.57	466.44	0.00	0.00	467.0
CO	8.66	0.00	0.00	0.00	8.7
total HAPs	0.19	343.91	0.00	0.02	344.1
worst case single HAP	0.19 (hexane)	157.74 (toluene)	0.00	0.02 (manganese)	

Uncontrolled/Unlimited Potential Emissions After Revision (tons/year)

Pollutant	Emissions Generating Activity				TOTAL
	Natural Gas Combustion	Surface Coating Operation	Powder Coating Operation	Welding Operation	
PM	0.20	60.06	0.31	1.11	61.69
PM10	0.78	60.06	0.31	1.11	62.27
PM2.5	0.78	60.06	0.00	0.00	60.84
SO2	0.06	0.00	0.00	0.00	0.06
NOx	10.31	0.00	0.00	0.00	10.31
VOC	0.57	457.53	0.00	0.00	458.10
CO	8.66	0.00	0.00	0.00	8.66
total HAPs	0.19	319.81	0.00	0.10	320.10
worst case single HAP	0.19 (hexane)	149.92 (toluene)	0.00	0.10 (manganese)	

Controlled/Limited Potential Emissions Prior to Revision (tons/year)

Pollutant	Emissions Generating Activity				TOTAL
	Natural Gas Combustion	Surface Coating Operation	Powder Coating Operation	Welding Operation	
PM	0.20	7.69	0.10	0.19	8.2
PM10/PM2.5	0.78	7.69	0.10	0.19	8.8
SO2	0.06	0.00	0.00	0.00	0.1
NOx	10.31	0.00	0.00	0.00	10.3
VOC	0.57	less than 99.4	0.00	0.00	less than 100
CO	8.66	0.00	0.00	0.00	8.7
total HAPs	0.19	less than 24.8	0.00	0.02	less than 25
worst case single HAP	0.19 (hexane)	less than 10 (toluene)	0.00	0.02 (manganese)	

Controlled/Limited Potential Emissions After Revision (tons/year)

Pollutant	Emissions Generating Activity				TOTAL
	Natural Gas Combustion	Surface Coating Operation	Powder Coating Operation	Welding Operation	
PM	0.20	7.69	0.31	1.11	9.31
PM10	0.78	7.69	0.31	1.11	9.89
PM2.5	0.78	7.69	0.00	0.00	8.47
SO2	0.06	0.00	0.00	0.00	0.06
NOx	10.31	0.00	0.00	0.00	10.31
VOC	0.57	less than 99.4	0.00	0.00	less than 100
CO	8.66	0.00	0.00	0.00	8.66
total HAPs	0.19	less than 24.8	0.00	0.10	less than 25
worst case single HAP	0.19 (hexane)	less than 10 (toluene)	0.00	0.10 (manganese)	

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR >100**

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-28477-00029
Reviewer: Anne-Marie C. Hart
Date: October 5, 2009

Heat Input Capacity of 23.55 MMBtu = sum of insignificant activities:
 5.2 MMBtu - six (6) natural gas fired make-up units
 11.9 MMBtu - nine (9) natural gas fired air rotation units
 2.45 MMBtu - twenty-one (21) natural gas fired space heaters
 4.0 MMBtu - one (1) natural gas fired cure oven

Heat Input Capacity

Potential Throughput

MMBtu/hr

MMCF/yr

23.6

206.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.20	0.78	0.06	10.31	0.57	8.66

*PM emission factor is filterable PM only. PM10/PM2.5 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See Table 1.4-1)

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.17E-04	1.24E-04	7.74E-03	1.86E-01	3.51E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.16E-05	1.13E-04	1.44E-04	3.92E-05	2.17E-04

Methodology is the same as above.

Total HAPs: 0.19

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Draper, Inc
Address City IN Zip: 411 South Pearl Street, Spiceland
Permit Number: 065-28477-00029
Reviewer: Anne-Marie C. Hart
Date: October 5, 2009

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
IL-359-R2	7.60	79.00%	0.00%	79.0%	0.00%	14.87%	0.590	6.00	6.00	6.00	21.25	510.10	93.09	12.37	40.38	50%
IL-555	8.20	73.00%	0.00%	73.0%	0.00%	14.58%	0.040	3.00	6.00	5.99	0.72	17.24	3.15	0.58	41.06	50%
CPL-794	8.20	73.00%	0.00%	73.0%	0.00%	17.94%	0.040	3.00	5.99	5.99	0.72	17.24	3.15	0.58	33.37	50%
CPL-1443	8.20	71.00%	0.00%	71.0%	0.00%	18.40%	0.040	3.00	5.82	5.82	0.70	16.77	3.06	0.62	31.64	50%
CPL-276R1	9.10	78.00%	0.00%	78.0%	0.00%	20.90%	0.040	3.00	7.10	7.10	0.85	20.44	3.73	0.53	33.96	50%
CPL-176R1	8.20	72.00%	0.00%	72.0%	0.00%	14.33%	0.040	3.00	5.90	5.90	0.71	17.00	3.10	0.60	41.20	50%
418 Primer	7.10	46.00%	0.00%	46.0%	0.00%	5.00%	0.040	3.00	3.27	3.27	0.39	9.41	1.72	1.01	65.32	50%
IL-360	7.50	80.00%	0.00%	80.0%	0.00%	12.80%	0.070	60.00	6.00	6.00	25.20	604.80	110.38	13.80	46.88	50%
KPV-1415	7.20	82.00%	0.00%	82.0%	0.00%	16.50%	0.040	3.00	5.90	5.90	0.71	17.00	3.10	0.34	35.78	50%
IL-360	7.50	80.00%	0.00%	80.0%	0.00%	12.80%	0.070	60.00	6.00	6.00	25.20	604.80	110.38	13.80	46.88	50%
Lackersolv 370A	7.10	100.00%	0.00%	100.0%	0.00%	0.00%	0.018	1.00	7.10	7.10	0.13	3.07	0.56	0.00	N/A	50%
Lackersolv 370A	7.10	100.00%	0.00%	100.0%	0.00%	0.00%	0.012	1.00	7.10	7.10	0.09	2.04	0.37	0.00	N/A	50%
Flat Black	7.89	84.12%	23.90%	60.2%	24.10%	10.68%	0.020	60.00	6.26	4.75	5.70	136.84	24.97	3.95	44.49	40%
Border Paint	7.90	87.00%	0.00%	87.0%	0.00%	7.70%	0.063	10.00	6.87	6.87	4.33	103.92	18.97	1.70	89.26	40%
Black Lacquer	7.56	82.10%	0.00%	82.1%	0.00%	12.40%	0.477	6.00	6.21	6.21	17.76	426.33	77.81	10.18	50.05	40%

Uncontrolled Potential Emissions

104.46 2507.00 457.53 60.06

Limited Potential Emissions

<99.4* 7.69**

* Usage limit required to limit the potential to emit of VOC to less than 100 tons per 12 consecutive month period.

** Reflects the use of dry filters as particulate matter control devices. PM is assumed to be equal to PM-10.

Note: Control efficiencies for all five (5) coating booths (EU2, EU4, EU8, EU10, and EU12) are 87% each.

METHODOLOGY

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47341
Permit Number: 065-28477-00029
Permit Reviewer Anne-Marie C. Hart
Date: October 5, 2009**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % ethylhexylph	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Bis(2-ethylhexyl)-phthalate Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total HAP Emissions (ton/yr)
IL-359-R2	7.60	0.590	6.00	5.27%	42.33%	0.00%	0.00%	0.00%	0.00%	6.21	49.88	0.00	0.00	0.00	0.00	56.09
IL-555	8.20	0.040	3.00	3.87%	39.73%	10.53%	0.00%	0.00%	0.00%	0.17	1.71	0.45	0.00	0.00	0.00	2.33
CPL-794	8.20	0.040	3.00	4.33%	39.40%	1.27%	0.00%	0.00%	0.00%	0.19	1.70	0.05	0.00	0.00	0.00	1.94
CPL-1443	8.20	0.040	3.00	5.00%	39.33%	1.20%	0.00%	0.00%	0.00%	0.22	1.70	0.05	0.00	0.00	0.00	1.96
CPL-276R1	9.10	0.040	3.00	3.07%	35.22%	2.41%	0.00%	0.00%	0.00%	0.15	1.68	0.12	0.00	0.00	0.00	1.95
CPL-176R1	8.20	0.040	3.00	4.33%	40.20%	16.87%	0.00%	0.00%	0.00%	0.19	1.73	0.73	0.00	0.00	0.00	2.65
418 Primer	7.10	0.040	3.00	0.00%	0.00%	12.30%	0.00%	0.00%	0.00%	0.00	0.00	0.46	0.00	0.00	0.00	0.46
IL-360	7.50	0.070	60.00	0.00%	22.07%	46.93%	0.00%	0.00%	0.00%	0.00	30.45	64.75	0.00	0.00	0.00	95.20
KPV-1415	7.20	0.040	3.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
IL-360	7.50	0.070	60.00	0.00%	22.07%	46.93%	0.00%	0.00%	0.00%	0.00	30.45	64.75	0.00	0.00	0.00	95.20
Lackersolv 370A	7.10	0.018	1.00	0.00%	70.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.39	0.00	0.00	0.00	0.00	0.39
Lackersolv 370A	7.10	0.012	1.00	0.00%	70.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.26	0.00	0.00	0.00	0.00	0.26
Flat Black	7.89	0.020	60.00	16.00%	12.40%	0.00%	0.00%	0.00%	0.00%	6.64	5.14	0.00	0.00	0.00	0.00	11.78
Border Paint	7.90	0.063	10.00	20.00%	20.00%	0.00%	5.00%	0.00%	1.00%	4.36	4.36	0.00	1.09	0.00	0.22	10.03
Black Lacquer	7.56	0.477	6.00	17.94%	21.59%	0.00%	0.00%	2.23%	0.00%	17.00	20.46	0.00	0.00	2.11	0.00	39.58

Total Uncontrolled Potential To Emit	35.11	149.92	131.36	1.09	2.11	0.22	319.81
Total Limited Potential To Emit	<10*	<10*	<10*	1.09	2.11	0.22	<24.8**

* Usage limit required to limit the potential to emit of HAPs to less than 10 tons per 12 consecutive month period.
** Usage limit required to limit the potential to emit of Total HAPs to less than 25 tons per 12 consecutive month period.

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate
From Powder Coating Operations**

Company Name: Draper, Inc
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-28477-00029
Reviewer: Anne-Marie C. Hart
Date: October 5, 2009

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds of Mat. (lb/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Booth I.D.																
Powder Coat System #4	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.10000	0.940	0.00	0.00	0.00	0.00	0.00	0.103	0.00	75%
Powder Coat System#7	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.10000	1.880	0.00	0.00	0.00	0.00	0.00	0.206	0.00	75%

Controlled Potential Emissions

Control Efficiency PM	Controlled PM tons/yr
99.95%	0.01034

METHODOLOGY

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

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

**Company Name: Draper, Inc
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-28477-00029
Reviewer: Anne-Marie C. Hart
Date: October 5, 2009**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	17	2.72	0.0055	0.0005			0.254	0.023	0.000	0	0.023
EMISSION TOTALS											
Potential Emissions lbs/hr							0.25				0.02
Potential Emissions lbs/day							6.10				0.55
Potential Emissions tons/year							1.11				0.10

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick r

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.



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

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

TO: Charles V Baker
Draper, Inc
411 S Pearl St
Spiceland, IN 47385

DATE: January 6, 2009

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

SUBJECT: Final Decision
Significant Permit Revision
065-28477-00029

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Michael Brooke (VP Mfg.)
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
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Thomas W. Easterly
Commissioner

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

January 6, 2009

TO: Spiceland Public Library

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

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

Applicant Name: Draper, Inc
Permit Number: 065-28477-00029

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 1/6/2010 Draper, Inc. 065-28477-00029 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Charles V Baker Draper, Inc. 411 S Pearl St Spiceland IN 47385 (Source CAATS) via confirmed delivery										
2		Michael Broome VP Mfg Draper, Inc. 411 S Pearl St Spiceland IN 47385 (RO CAATS)										
3		Lisa & Joe Hillman 2460 West 650 North Middletown IN 47356 (Affected Party)										
4		Mr. Stults 5363 W 300 N Middletown IN 47356 (Affected Party)										
5		Linda K. Bente & Thom Horton & Brigham Robbins 8924 W. 550 N. Middletown IN 47356 (Affected Party)										
6		Ms. Nancy Fischer 5587 N 400 W Middletown IN 47356 (Affected Party)										
7		Beth & James Solomon 3888 W. 850 N. Middletown IN 47356 (Affected Party)										
8		Maynard & Mary Powell 130 N 6th St Middletown IN 47356 (Affected Party)										
9		Ms. Kim Bond 5261 N. CR 850 W. Middletown IN 47356 (Affected Party)										
10		John & Carolyn Hinton 4767 N. 450 W Middletown IN 47356 (Affected Party)										
11		Mr. & Mrs. Sam Todd 4351 N. CR 575 W. Middletown IN 47356 (Affected Party)										
12		Ferrell 2528 N. CR 500 W. Middletown IN 47356 (Affected Party)										
13		Mr & Mrs. Jim Minnick 144 N. 7th Street Middletown IN 47356 (Affected Party)										
14		Mr. Don Shaw 3322 W 400 N Middletown IN 47356 (Affected Party)										
15		Frank & Jeff McCrocklin 683 N 8th St Middletown IN 47356 (Affected Party)										

Total number of pieces Listed by Sender 14	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		Eunice & Barb Stevens 6047 N CR 850 W Middletown IN 47356 (Affected Party)										
2		Mr. John Shay 9294 W CR 950 N Middletown IN 47356 (Affected Party)										
3		Mrs. Beverly Price 8206 N Raider Rd Middletown IN 47356 (Affected Party)										
4		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 (Affected Party)										
5		Mr. Ronnie Sowers 818 North 500 West New Castle IN 47362 (Affected Party)										
6		Marilyn & Vernon Cherrett 712 North 500 West New Castle IN 47362 (Affected Party)										
7		Don Miller 3632 W. CR 100 S New Castle IN 47362 (Affected Party)										
8		Andrew Clark 735 N. 25th Street New Castle IN 47362 (Affected Party)										
9		Jeffrey & Debbie Powell 120 N 600 W New Castle IN 47362 (Affected Party)										
10		Mary & Mark Pierce 1512 N 425 W New Castle IN 47362 (Affected Party)										
11		Cronk & McCraine Residence 1441 W. CR 100 South New Castle IN 47362 (Affected Party)										
12		Mr. Troy Howell 1354 Cadiz Pk New Castle IN 47362 (Affected Party)										
13		Mr. & Mrs. Raymond Roseman 2645 S. Greensboro Pike New Castle IN 47362 (Affected Party)										
14		Mr. James Smith 4808 W SR 234 New Castle IN 47362 (Affected Party)										
15		Violet Wells 3828 West Street, Road 38 New Castle IN 47362 (Affected Party)										

Total number of pieces Listed by Sender 15	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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Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Jack & Walter Thomas 4199 US 36 East New Castle IN 47362 (Affected Party)										
2		Mr. & Mrs. Hersel Ankrom 903 Lincoln Avenue New Castle IN 47362 (Affected Party)										
3		Gerald & Roberta Haynes 2625 N CR 650 W New Castle IN 47362 (Affected Party)										
4		Mr. Stanley Richards 7220 W SR 38 New Castle IN 47362 (Affected Party)										
5		Mrs. Joyce Thompson 6663 E CR 2005 New Castle IN 47362 (Affected Party)										
6		Rose & Thomas Kramer 137 N CR 500 W New Castle IN 47362 (Affected Party)										
7		Henry County Board of Commissioners 101 S. Main St New Castle IN 47362 (Local Official)										
8		Mr. Jay Cory 478 N. Clover Drive New Castle IN 47362 (Affected Party)										
9		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)										
10		Douglas & Jill Haynes P.O. Box 6 Shirley IN 47384 (Affected Party)										
11		Robert Harris 6110 W. 100 S. Shirley IN 47384 (Affected Party)										
12		Spiceland Town Township 106 W Main St Spiceland IN 47385 (Library)										
13		Marsha & David Gratner P.O. Box 8 Sulphur Springs IN 47388 (Affected Party)										
14		Katherine & Stephen Fox PO Box 300 Shirley IN 47384 (Affected Party)										
15		Louis Crowe 3725 S. Memoria Drive New Castle IN 47362 (Affected Party)										

Total number of pieces Listed by Sender 15	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		Belinda & Jeff Goble 5562 W. CR 100 N. New Castle IN 47362 (Affected Party)										
2		Ron Elliott 3079 N. CR 650 W New Castle IN 47362 (Affected Party)										
3		Spiceland Town Council and Town Manager 130 E. Main St. Spiceland IN 47385 (Local Official)										
4		Henry County Health Department 1201 Race Street, Suite 208 New Castle IN 47362-4653 (Health Department)										
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender 4	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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