



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: April 5, 2010

RE: Fort Wayne Pools, Inc. / 003-28944-00071

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from 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-AM.dot12/3/07



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Mr. Larry Kissinger
Fort Wayne Pools, Inc.
6930 Gettysburg Pike
Fort Wayne, IN 46804

April 5, 2010

Re: Exempt Construction and Operation Status,
003-28944-00071

Dear Mr. Kissinger:

The application from Fort Wayne Pools, Inc, received on February 5, 2010, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary pool coping and liner manufacturing plant, located at 6930 Gettysburg Pike, Fort Wayne, IN, is classified as exempt from air pollution permit requirements:

- (a) One (1) air atomization spray paint booth for coating pool coping, identified as EU-12 and constructed in 1980, with a maximum coating material and accessory solvent usage rate of 2.21 pounds per hour, using a dry filter for overspray particulate matter control and exhausting through one (1) stack, identified as S-12.
- (b) One (1) natural gas fired air make-up unit, rated at 3.5 MMBtu per hour, exhausting through one (1) stack, identified as G-13;
- (c) One (1) natural gas fired air make-up unit, rated at 1.96 MMBtu per hour, exhausting through one (1) stack, identified as G-14;
- (d) Twelve (12) natural gas fired space heaters, each rated at 0.4 MMBtu per hour, and each exhausting through one (1) stack, identified as G-1 through G-12;
- (e) One (1) welding booth for coping and pool supports, exhausting through one (1) stack, identified as S-13;
- (f) Vessels (55 gallon drums) storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (g) Equipment relating to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (h) Replacement or repair of electrostatic precipitators, bags in baghouse and filters in other air filtration equipment;
- (i) Paved and unpaved roads and parking lots with public access [326 IAC 6-4];
- (j) Usage of trichloroethylene (2.5 gallons per year) in the pool liner operation;
- (k) One (1) storage tank, with a maximum storage capacity of 275 gallons of diesel, installed in 2007.

The following conditions shall be applicable:

1. 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
2. 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.
3. 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the air atomization coping spray booth, identified as EU-12, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

4. 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.

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

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

If you have any questions on this matter, please contact Deborah Cole, permit reviewer, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-5377 or at 1-800-451-6027 (ext. 4-5377) or dcole@idem.in.gov.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/DAC

cc: File - Allen County
Allen County Health Department
Compliance and Enforcement Branch
Billing, Licensing and Training Section

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Title V Permit Transitioning to an Exemption

Source Description and Location

Source Name: Fort Wayne Pools, Inc.
Source Location: 6930 Gettysburg Pike, Fort Wayne, IN 46804
County: Allen
SIC Code: 3083
Exemption No.: 003-28944-00071
Permit Reviewer: Deborah Cole

On February 5, 2010, the Office of Air Quality (OAQ) received an application from Fort Wayne Pools, Inc. requesting to transition from a Title V Permit to an Exemption

Existing Approvals

The source has been operating under Title V Operating Permit Renewal No. 003-24378-00071, issued on April 1, 2008.

Due to this application, the source is transitioning from a Title V to an Exemption due to the removal of some of the source's emission units.

County Attainment Status

The source is located in Allen County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Allen 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.

Allen County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the

effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.

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

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

On February 5, 2010, Fort Wayne Pools, Inc. submitted an application to the OAQ requesting to transition from a Title V permit to an Exemption because its operations have changed. The source has removed a fiberglass resin chop spray booth, grinding and machining operation, a urethane foam spray booth and the application of foam packaging material to fiberglass products. They are now a distribution, pool coping and liner manufacturing facility but retain the same SIC code.

The source consists of the following existing emission units:

- (a) One (1) air atomization spray paint booth for coating pool coping, identified as EU-12 and constructed in 1980, with a maximum coating material and accessory solvent usage rate of 2.21 pounds per hour, using a dry filter for overspray particulate matter control and exhausting through one (1) stack, identified as S-12.
- (b) One (1) natural gas fired air make-up unit, rated at 3.5 MMBtu per hour, exhausting through one (1) stack, identified as G-13;
- (c) One (1) natural gas fired air make-up unit, rated at 1.96 MMBtu per hour, exhausting through one (1) stack, identified as G-14;
- (d) Twelve (12) natural gas fired space heaters, each rated at 0.4 MMBtu per hour, and each exhausting through one (1) stack, identified as G-1 through G-12;
- (e) One (1) welding booth for coping and pool supports, exhausting through one (1) stack, identified as S-13;
- (f) Vessels (55 gallon drums) storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (g) Equipment relating to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (h) Replacement or repair of electrostatic precipitators, bags in baghouse and filters in other air filtration equipment;
- (i) Paved and unpaved roads and parking lots with public access [326 IAC 6-4];
- (j) Usage of trichloroethylene (2.5 gallons per year) in the pool liner operation;

(k) One (1) storage tank, with a maximum storage capacity of 275 gallons of diesel, installed in 2007.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units at this source.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM ₁₀ *	**PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
EU-12 -Coping Paint Booth	0.227	0.227	0.227	0	0	8.75	0	3.657	3.657 (toluene)
Natural Gas Combustion	0.09	0.34	0.34	0.03	4.49	0.25	3.77	0.080	0.080
Welding	0.0009	0.0009	0.0009	0.00	0.00	0.00	0.00	0.0001	0.0001
Pool Liner Operation	0.00	0.00	0.00-	0.00	0.00	0.09	0.00	0.088	0.088 trichloroethylene
Total PTE of Entire Source	.318	.568	.568	0.030	4.490	9.09	3.77	3.825	3.825
Exemptions Levels	5	5	5	10	10	10	25	25	10

* 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".

** In the absence of specific PM_{2.5} emission factors, PM_{2.5} emissions are assumed to be equal to PM₁₀ emissions.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, are not included in the permit because the source does not use paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl); does not perform auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations; and does not perform spray applications of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), to any part or product made of metal or plastic or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (c) This requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.3880, Subpart MMMM are not included in this permit because the source will limit the source-wide usage of coatings that contain hazardous air pollutants (HAP) used in the surface coating of miscellaneous metal parts to less than 250 gallons per year. The source has never used more than 250 gallons of coatings that contain HAP for the surface coating of miscellaneous metal parts. Therefore, pursuant to 40 CFR 63.3881(b), this source is exempt from the requirements of National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) and they are not included in this permit.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR Part 63, Subpart XXXXXX) are not included in this permit because this source does not fall under any one of the twelve (12) SIC Codes covered by this rule.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

Entire Source

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is 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.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
Pursuant to 326 IAC 8-1-6 new facilities are subject only if they have potential emissions of 25 tons of VOC or more per year, or are not otherwise regulated by other provisions of Article 8. This source has potential emissions of less than 25 tons per year of VOC emissions from coating booth EU-12, therefore this source is not subject to 326 IAC 8-1-6. .

Welding Operations

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from this rule since they use less than six hundred twenty-five (625) pounds of rod or wire per day. Therefore, 326 IAC 6-3 does not apply to the welding operations.

Surface Coating Operations

- (i) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the air atomization coping spray booth, identified as EU-12, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours

after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

- (j) 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.
- (k) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (l) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (m) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
The source is not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). The potential VOC emissions from the metal surface coating operation in the coping paint booth, EU-12 (constructed in 1980), are less than 25 tons per year. Therefore, pursuant to 326 IAC 8-2-1, the 326 IAC 8-2-9 rules do not apply.

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 February 5, 2010.

The operation of this source shall be subject to the conditions of the attached Exemption No. 003-28944-00071. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Deborah Cole 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) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Company Name: Fort Wayne Pools, Inc.
 Address City IN Zip: 6930 Gettysburg Pike, Fort Wayne, IN 46804
 Permit Number: 003-28944-00071

Reviewer: Deborah Cole
 Date: March 31, 2010

Emissions Summary

Uncontrolled Potential Emissions (tons/year)					
Pollutant	EU-12	NG Combustion	Welding	Pool Liner Operation	Total Emissions
	(tons/yr)				
PM	0.227	0.090	0.008672	0.000	0.326
PM10	0.227	0.340	0.008672	0.000	0.576
PM 2.5	0.227	0.340	0.008672	0.000	0.568
SO2	0.000	0.030	0.000000	0.000	0.030
NOx	0.000	4.490	0.000000	0.000	4.490
VOC	8.750	0.250	0.000000	0.000	9.000
CO	0.000	3.770	0.000000	0.000	3.770
Total HAPs	3.657	0.080	0.000788	0.088	3.826
Worst-case Single HAP	3.657	0.080	0.000180	0.088	3.825

Limited and Controlled Emissions (tons/year)					
Pollutant	EU-12	NG Combustion	Welding	Insignificant Activities	Total Emissions
	(tons/yr)				
PM	0.227	0.090	0.008672	0.000	0.326
PM10	0.227	0.340	0.008672	0.000	0.576
PM 2.5	0.227	0.340	0.008672	0.000	0.568
SO2	0.000	0.030	0.000000	0.000	0.030
NOx	0.000	4.490	0.000000	0.000	4.490
VOC	8.750	0.250	0.000000	0.000	9.000
CO	0.000	3.770	0.000000	0.000	3.770
Total HAPs	3.657	0.080	0.000788	0.088	3.826
Worst-case Single HAP	3.657	0.080	0.000180	0.088	3.825

Company Name: Fort Wayne Pools, Inc.
 Address City IN Zip: 6930 Gettysburg Pike, Fort Wayne, Indiana 46804
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VOC and Particulate from Surface Coating Operations

Material	Density (lbs/gal)	Weight % Volatiles (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Material Usage (lbs/hr)	VOC (lbs/gal) Less Water	VOC (lbs/gal)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Potential Particulate (tons/yr)	lbs VOC/ gal Solids	Transfer Efficiency
Coping Paint Booth (EU-12)															
Coping Paint Thinner	6.60	100.00%	0.0%	100.00%	0.0%	0.00%	1.310	6.60	6.60	1.31	31.44	5.74	0.000	-	75%
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.00%	0.435	7.25	7.25	0.44	10.44	1.91	0.000	-	75%
Coping Paint	9.27	54.95%	0.0%	54.95%	0.0%	27.81%	0.460	5.09	5.09	0.25	6.07	1.11	0.227	18.32	75%
Sub-Total							2.205			2.00	47.95	8.75	0.227		
Pool Liners															
Trichloroethylene	12.16	100.00%	0.0%	100.00%	0.0%	0.00%	0.020	12.16	12.16	0.02	0.48	0.09	0.000		75%

Methodology:

VOC (lbs/gal) Less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

VOC (lbs/gal) = Density (lbs/gal) * Weight % Organics

Potential VOC (lbs/hr) = Maximum Material Usage (lbs/hr) * Weight % Organics

Potential VOC (lbs/day) = Maximum Material Usage (lbs/hr) * Weight % Organics * (24 hrs/ day)

Potential VOC (tons/yr) = Maximum Material Usage (lbs/hr) * Weight % Organics * (24 hrs/ day) * (365 day/ yr) * (1 ton/ 2000 lbs)

Potential Particulate (tons/yr) = Maximum Material Usage (lbs/hr) * (1- Weight % Volatiles) * (1-Transfer Efficiency) * (8760 hrs/ yr) * (1 ton/ 2000 lbs)

lbs VOC/ gal Solids = (Density (lbs/gal) * Weight % Organics) / (Volume % Non-Volatiles)

Company Name: Fort Wayne Pools, Inc.
Address: 6930 Gettysburg Pike, Fort Wayne, Indiana 46804
Permit Number: 003-28944-00071
Reviewer: Deborah Cole
Date: March 31, 2010

HAP Emissions

Material	Density (lbs/gal)	Maximum Material Usage (lbs/hr)	Flash-off (%)	Weight % Toluene	Weight % Trichloroethylene	Toluene Emissions (tons/yr)	Trichloroethylene Emissions (tons/yr)
Coping Paint Booth (EU-12)							
Coping Paint Thinner	6.60	1.310	100%	20.0%	0.0%	1.15	0.00
Toluene	7.25	0.435	100%	100.0%	0.0%	1.91	0.00
Coping Paint	9.27	0.460	100%	30.0%	0.0%	0.60	0.00
						3.66	0.00
Pool Liners							
1,1,1-Trichloroethylene	12.16	0.02	100%	0.0%	100.0%	0.00	0.09
Potential to Emit (tons/yr):						3.66	0.09

Methodology:

HAP emission rate (tons/yr) = Maximum Material Usage (lbs/hr) * Flash-off (%) * Weight % HAP * (8760 hrs/ yr) * (1 ton/ 2000 lbs)

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

**Company Name: Fort Wayne Pools, Inc.
Address City IN Zip: 6930 Gettysburg Pike, Fort Wayne, Indiana 46804
Permit Number: 003-28944-00071
Reviewer: Deborah Cole
Date: March 31, 2010**

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr
10.3	89.9

Facilities	MMBtu/hr
Preheaters #2 and #3	15
Misc. Heaters	2.28
Total	17.3

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.09	0.34	0.03	4.49	0.25	3.77

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr < 100**

HAPs Emissions

Company Name: Fort Wayne Pools, Inc.
Address City IN Zip: 6930 Gettysburg Pike, Fort Wayne, Indiana 46804
Permit Number: 003-28944-00071
Reviewer: Deborah Cole

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.437E-05	5.393E-05	3.370E-03	8.089E-02	1.528E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total
Potential Emission in tons/yr	2.247E-05	4.943E-05	6.291E-05	1.708E-05	9.437E-05	8.481E-02

Methodology is the same as page 4.

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
MIG Welding**

**Company Name: Fort Wayne Pools, Inc.
Address City IN Zip: 6930 Gettysbury Pike
Permit Number: 003-28944-00071
Plt ID: 003-00071
Reviewer: Deborah Cole
Date: March 31, 2010**

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)	1	0.36	0.0055	0.0005			0.001980	0.0001800	0.0000000	0.0000000	0.000180
EMISSION TOTALS											
Potential Emissions lbs/hr						0.001980					0.000180
Potential Emissions lbs/day						0.047520					0.004320
Potential Emissions tons/year						0.008672					0.000788

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
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: Larry Kissinger
Fort Wayne Pools, Inc.
6930 Gettysburg Pike
Fort Wayne, IN 46804

DATE: April 5, 2010

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

SUBJECT: Final Decision
Exemption
003-28944-00071

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:
Mat Geyman - Dir. of Ops
Elizabeth Hill - Bruce Carter & Associates
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 4/5/2010 Fort Wayne Pools, Inc 003-28944-00071 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		Larry Kissinger Fort Wayne Pools, Inc 6930 Gettysburg Pike Ft Wayne IN 46804 (Source CAATS) via confirmed delivery										
2		Matt Geyman Dir of Ops Fort Wayne Pools, Inc 6930 Gettysburg Pike Ft Wayne IN 46804 (RO CAATS)										
3		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
4		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
5		Mr. Victor Locke WPTA-TV P.O.Box 2121 Fort Wayne IN 46801 (Affected Party)										
6		Fort Wayne City Council and Mayors Office One Main Street Fort Wayne IN 46802 (Local Official)										
7		Mr. Allen Mertens 6611 Kline St. Fort Wayne IN 46804 (Affected Party)										
8		Thomas Furven 611 Nordale Fort Wayne IN 46804 (Affected Party)										
9		Dale Warner 108 Nordale Fort Wayne IN 46804 (Affected Party)										
10		Kevin Olszowy 416 Blake Dr. Fort Wayne IN 46804 (Affected Party)										
11		Mr. Delmar Jackson 7029 Nordale Dr. Fort Wayne IN 46804 (Affected Party)										
12		Charles & Mary Caldwell 6921 Nordale Dr. Fort Wayne IN 46804 (Affected Party)										
13		Mrs. Dean Hendy 102 Nordale Dr. Fort Wayne IN 46804 (Affected Party)										
14		Fred & Sue Snyder 318 Nordale Dr. Fort Wayne IN 46804 (Affected Party)										
15		Mrs. Gloria Mertens 6611 Kline Fort Wayne IN 46804 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Arnold 102 Nordale Dr. Fort Wayne IN 46804 (Affected Party)										
2		Mr. Jamie Weaver 6723 Goodrich St. Fort Wayne IN 46804 (Affected Party)										
3		Mr. David Weavers 6723 Goodrich Rd. Fort Wayne IN 46804 (Affected Party)										
4		Mr. Jason Matthias 319 Nordale Fort Wayne IN 46804 (Affected Party)										
5		Mr. Ron McConnehey 6632 Kline St. Fort Wayne IN 46804 (Affected Party)										
6		Ms. Peggy, Don & Casey Fogle 6804 Nordale Dr. Fort Wayne IN 46804 (Affected Party)										
7		Mrs. Dave Robinson 6924 Regent Ct. Fort Wayne IN 46804 (Affected Party)										
8		Ms. Jamie Haff 6902 Nordale Drive Fort Wayne IN 46804-1044 (Affected Party)										
9		Mr. John E. Hampton Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
10		Indiana Chamber of Commerce 115 West Washington Street, Suite 850S Indianapolis IN 46204-3407 (Affected Party)										
11		The Honorable Richard Lugar 306 Hart Senate Office Building Washington DC 20510-1401 (Legislator)										
12		Mr. Evan Bayh United States Senator, Indiana 717 Hart Senate Office Building Washington DC 20510-1404 (Legislator)										
13		Ms. Elizabeth Hill Bruce Carter Associates 616 S 4th Street Elkhart IN 46516 (Consultant)										
14		Mark Souder United States Representative 3105 Federal Building - 1300 S. Harrison Street Fort Wayne IN 46802 (Legislator)										
15		Allen Co. Board of Commissioners One Main St. Fort Wayne IN 46802 (Local Official)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Fort Wayne-Allen County Health Department 1 E Main Street, 5th Floor Fort Wayne IN 46802-1810 (Health Department)										
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
1			