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: August 10, 2010

RE: CLM Pallet Recycling / 097 - 29030 - 00654

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

IDEM

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Minor Source Operating Permit
OFFICE OF AIR QUALITY

CLM Pallet Recycling, Inc.
2900 N Shadeland Ave
Indianapolis, IN 46219

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

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

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

Operation Permit No.: M097-29030-00654	
Issued by: Alfred C. Dumaual, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 10, 2010 Expiration Date: August 10, 2015

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary repair and repainting of wood pallets.

Source Address:	2900 N Shadeland Ave, Indianapolis, IN 46219
General Source Phone Number:	317-549-3952
SIC Code:	2448
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) Line 1 Spray Booth, identified as SB-1, constructed in 2009, approved for modification in 2010, with a maximum capacity of 1,200 wood pallets per hour, utilizing automated HVLP spray application and pallet handling equipment, using a dry filter as control, and exhausting to stack ST-1.

(b) Line 1 Stencil Area, identified as SA-1, constructed in 2009, approved for modification in 2010, with a maximum capacity of 1,200 wood pallets per hour, utilizing a manually operated HVLP spray application, using less than five (5) gallons of coating per day, and exhausting within the building.

(c) Line 2 Spray Booth, identified as SB-2, constructed in 2009, approved for modification in 2010, with a maximum capacity of 380 wood pallets per hour, utilizing HVLP spray application, using a dry filter as control, and exhausting to stack ST-2.

(d) Line 2 Stencil Area, identified as SA-2, constructed in 2009, approved for modification in 2010, with a maximum capacity of 380 wood pallets per hour, utilizing a manually operated HVLP spray application, using less than five (5) gallons of coating per day, and exhausting within the building.

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, M097-29030-00654, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M097-29030-00654 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

(b) 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.18 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

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

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(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 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Line 1 Spray Booth, identified as SB-1, constructed in 2009, approved for modification in 2010, with a maximum capacity of 1,200 wood pallets per hour, utilizing automated HVLP spray application and pallet handling equipment, using a dry filter as control, and exhausting to stack ST-1.

(c) Line 2 Spray Booth, identified as SB-2, constructed in 2009, approved for modification in 2010, with a maximum capacity of 380 wood pallets per hour, utilizing HVLP spray application, using a dry filter as control, and exhausting to stack ST-2.

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

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

D.1.1 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2(d), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

(a) The source shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source 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.

(c) If overspray is visibly detected the source 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 shall be maintained for five (5) years.

D.1.2 Particulate [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from spray booths SB-1 and SB-2 shall not exceed 0.03 grains per dry standard cubic foot, each. In order to comply with this rule, the dry filters shall be used for control at all times the paint booths are in operation.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	CLM Pallet Recycling, Inc.
Address:	2900 N Shadeland Ave
City:	Indianapolis, Indiana 46219
Phone #:	317-697-3373
MSOP #:	M097-29030-00654

I hereby certify that CLM Pallet Recycling, Inc. is :
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that CLM Pallet Recycling, Inc. is :
- ☐ in compliance with the requirements of MSOP M097-29030-00654.
- ☐ not in compliance with the requirements of MSOP M097-29030-00654.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	**CLM Pallet Recycling, Inc.**
Source Location:	**2900 N Shadeland Ave, Indianapolis, IN 46219**
County:	**Marion**
SIC Code:	**2448**
Permit No.:	**M097-29030-00654**
Permit Reviewer:	**Christine L. Filutze**

On July 3, 2010, the Office of Air Quality (OAQ) had a notice published in the Indy Star, Indianapolis, Indiana, stating that CLM Pallet Recycling, Inc. had applied to transition from a Registration, No. 097-27153-00654, issued on January 9, 2009, to a Minor Source Operating Permit (MSOP), due to an increase in throughput associated with the repair and repainting of wood pallets. The notice also stated that the OAQ proposed to issue a MSOP No. M097-29030-00654 for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On July 29, 2010, Mr. Matt Mosier from the City of Indianapolis' Office of Sustainability submitted comments to IDEM, OAQ regarding the draft MSOP No. M097-29030-00654.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

> D.1.2 applies 326 IAC 6.5. The TSD, Appendix A, Emissions Summary has Uncontrolled PM at 71 tpy and controlled at 1.23 tpy. From that, I am not seeing the PTE of 100 tons per year (tpy) or more or the actual of 10 tpy or more. Could you clarify? Also, if you apply 0.03 gr/dscf, I did not see any flow rates in the TSD to show compliance is achieved based on the control levels.

Response to Comment 1:

> Because the source has not provided documentation to show their actual PM emissions are less than 10 tons per year (tpy), IDEM, OAQ considers that 326 IAC 6.5 is applicable. Since the potential to emit for particulate matter after controls is less than 10 tpy, as long as the source uses the dry filters as control at all times the paint booths are in operation, then the source is able to comply with this rule. Therefore, IDEM, OAQ has updated the permit as follows:

D.1.2 Particulate [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from spray booths SB-1 and SB-2 shall not exceed 0.03 grains per dry standard cubic foot, each. **In order to comply with this rule, the dry filters shall be used for control at all times the paint booths are in operation.**

IDEM Contact

(a) Questions regarding this proposed MSOP No. M097-29030-00654 can be directed to Christine L. Filutze 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) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.

(b) A copy of the permit 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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Registration Transitioning to a Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	**CLM Pallet Recycling, Inc.**
Source Location:	**2900 N Shadeland Ave, Indianapolis, IN 46219**
County:	**Marion**
SIC Code:	**2448**
Operation Permit No.:	**M097-29030-00654**
Permit Reviewer:	**Christine L. Filutze**

On March 1, 2010, the Office of Air Quality (OAQ) received an application from CLM Pallet Recycling, Inc. related to the transition of Registration No. 097-27153-00654, issued on January 9, 2009, to a MSOP, due to an increase in throughput, associated with the repair and repainting of wood pallets.

Existing Approvals

The source has been operating under Registration No. 097-27153-00654, issued on January 9, 2009.

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

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O_3	Attainment effective November 8, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally 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. Marion 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
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

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

Fugitive Emissions

(a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by CLM Pallet Recycling, Inc. on March 1, 2010, relating to a proposed modification to increase the throughput of the two (2) paint spray booths and stencil areas. Each painting line consists of a spray paint booth and a stencil area. Blue paint is applied to the ends of wooden pallets in a spray booth then white paint logos are applied to the painted ends of pallets in the stencil station.

The following is a list of the modified emission units and pollution control devices:

(a) Line 1 Spray Booth, identified as SB-1, constructed in 2009, approved for modification in 2010, with a maximum capacity of 1,200 wood pallets per hour, utilizing automated HVLP spray application and pallet handling equipment, using a dry filter as control, and exhausting to stack ST-1.

(b) Line 1 Stencil Area, identified as SA-1, constructed in 2009, approved for modification in 2010, with a maximum capacity of 1,200 wood pallets per hour, utilizing a manually operated HVLP spray application, using less than five (5) gallons of coating per day, and exhausting within the building.

(c) Line 2 Spray Booth, identified as SB-2, constructed in 2009, approved for modification in 2010, with a maximum capacity of 380 wood pallets per hour, utilizing HVLP spray application, using a dry filter as control, and exhausting to stack ST-2.

(d) Line 2 Stencil Area, identified as SA-2, constructed in 2009, approved for modification in 2010, with a maximum capacity of 380 wood pallets per hour, utilizing a manually operated HVLP spray application, using less than five (5) gallons of coating per day, and exhausting within the building.

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 – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	71.04
PM10(1)	71.04
PM2.5	71.04
SO_2	0.00
NO_x	0.00
VOC	7.56
CO	0.00
Total HAPs	0.00

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM, PM10 and PM2.5 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

(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 the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, Subpart JJ are not included in this permit, since the source does not manufacture wood furniture.

(c) The requirements of 40 CFR 63, Subpart QQQQ, NESHAP for Surface Coating of Wood Building Products (40 CFR Part 63.4680 - 63.4781) (326 IAC 20-79), are not included in this permit, since the source is not a major source of HAPs, as defined in 40 CFR 63.2, and the source does not surface coat wood building products. This source performs

surface coating of wood pallets.

(d) The requirements of 40 CFR 63, Subpart HHHHHH, NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63.11169 - 63.11180), are not included in this permit, since this source does not perform paint stripping using chemical strippers that contain methylene chloride for the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipment, and does not perform spray application of coatings that contain chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal parts/products.

(e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

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:

(a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) 326 IAC 2-1.1-5 (PM2.5 Nonattainment Counties)
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM2.5), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

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

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

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

(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

(g) 326 IAC 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.

(h) 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.

State Rule Applicability – Surface Coating (SB-1, SB-2, SA-1, SA-2)

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

(1) Pursuant to 326 IAC 6-3-1(b)(15), since SA-1 and SA-2 surface coating manufacturing processes are not otherwise exempt in subdivisions (5) through (8), and use less than five (5) gallons per day, they are exempt from this rule.

(2) Pursuant to 326 IAC 6-3-2(d), surface coating processes for SB-1 and SB-2 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

(A) The source shall operate the control device in accordance with manufacturer's specifications.

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

(ii) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(iii) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(C) If overspray is visibly detected the source 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 shall be maintained for five (5) years.

(j) 326 IAC 6.5 (Particulate Matter Limitations)
Pursuant to 326 IAC 6.5-1-2(a), particulate emissions for sources located in Marion County, not specifically listed in 326 IAC 6.5-6, that have potential to emit 100 tons or more, or have actual emissions of 10 tons or more of particulate matter per year, shall not exceed 0.03 grain per dry standard cubic foot (dscf). Therefore, the particulate emissions from the surface coating booths, identified as SB-1 and SB-2, shall not exceed 0.03 grain per dry standard cubic foot (dscf), each.

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

Each emission unit at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited potential to emit of VOC from each emission unit is less than twenty-five (25) tons per year.

(l) 326 IAC 8-2-10 (VOC Rules: Flat Wood Panels; Manufacturing Operations)
The source is not subject to the requirements of 326 IAC 8-2-10, since the source does not manufacture or surface coat flat wood panels.

(m) 326 IAC 8-2-12 (VOC Rules: Wood Furniture and Cabinet Coating)
The surface coating operations at this source were constructed after July 1, 1990, but the source does not apply coatings to wood furniture. Therefore, 326 IAC 8-2-12 does not apply.

(n) 326 IAC 8-6 (VOC Rules: Organic Solvent Emission Limitations)
This source is located in Marion County and is not limited by other rules in 326 IAC 8. However, the source was not an existing source as of January 1, 1980, and the source does not have potential emissions of 90.7 megagrams (100 tons) or greater per year of VOC. Therefore, 326 IAC 8-6 does not apply.

(o) 326 IAC 8-11 (VOC Rules: Wood Furniture Coatings)
The source is not subject to the requirements of 326 IAC 8-11, because the source does not surface coat wood furniture. Therefore, 326 IAC 8-11 does not apply.

Compliance Determination, Monitoring and Testing Requirements

(a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Spray Booths SB1, SB2	Overspray	As needed

(b) There are no testing requirements applicable to this source.

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 March 1, 2010.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. M097-29030-00654. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Christine L. Filutze 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) 233-8397 or toll free at 1-800-451-6027 extension (3-8397).

(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: Emissions Calculations
Emissions Summary

Company Name: CLM Pallet Recycling, Inc.
Address City IN Zip: 2900 N Shadeland Ave, Indianapolis, IN 46219
Permit No.: M097-29030-00654
Reviewer: Christine L. Filutze
Date: 5/13/2010

Uncontrolled Potential Emissions

	PM (ton/yr)	PM10 (ton/yr)	PM2.5 (ton/yr)	SO2	NOx	CO	VOC (ton/yr)	HAP (ton/yr)
Line 1 Spray Booth (SB-1)	53.30	53.30	53.30	0.00	0.00	0.00	5.31	0.00
Line 2 Spray Booth (SB-2)	16.88	16.88	16.88	0.00	0.00	0.00	1.68	0.00
Line 1 Stencil Area (SA-1)	0.86	0.86	0.86	0.00	0.00	0.00	0.44	0.00
Line 2 Stencil Area (SA-2)	0.00	0.00	0.00	0.00	0.00	0.00	0.14	0.00
Total	**71.04**	**71.04**	**71.04**	**0.00**	**0.00**	**0.00**	**7.56**	**0.00**

Controlled Potential Emissions*

	PM (ton/yr)	PM10 (ton/yr)	PM2.5 (ton/yr)	SO2	NOx	CO	VOC (ton/yr)	HAP (ton/yr)
Line 1 Spray Booth (SB-1)	0.28	0.28	0.28	0.00	0.00	0.00	5.31	0.00
Line 2 Spray Booth (SB-2)	0.09	0.09	0.09	0.00	0.00	0.00	1.68	0.00
Line 1 Stencil Area (SA-1)	0.86	0.86	0.86	0.00	0.00	0.00	0.44	0.00
Line 2 Stencil Area (SA-2)	0.00	0.00	0.00	0.00	0.00	0.00	0.14	0.00
Total	**1.23**	**1.23**	**1.23**	**0.00**	**0.00**	**0.00**	**7.56**	**0.00**

* Control Devices are **not** needed to maintain MSOP levels.

Appendix A: Emissions Calculations
Surface Coating - Line # 1 (Painting Wood Pallets)

Company Name: CLM Pallet Recycling, Inc.
Address City IN Zip: 2900 N Shadeland Ave, Indianapolis, IN 46219
Permit No.: M097-29030-00654
Reviewer: Christine L. Filutze
Date: 5/13/2010

Coating Information				VOC Content, as Received		Solids Content, as Received		HAP Content, as Received	
Manufacturer	**Color**	**Product Code**	**Density (lb/gal)**	**VOC Content (g/L)**	**VOC Content (lb/gal)**	**% Solids (by weight)**	**% Solids (by volume)**	**HAP Content (g/L)**	**HAP Content (lb/gal)**
Kelly-Moore	Blue	0341-104	9.91	11	0.092	31.0%	0.00	0.00	0.000
Kelly-Moore	White	0341-100	11.41	10	0.083	48.0%	0.00	0.00	0.000

Pallet Throughput Information

			Annual Throughput (pallets/yr)
Unit	**Potential Throughput (pallets/hr)**	**Projected Actual Throughput (pallets/hr)**	**Potential to Emit**
Wood Pallets Painted / Repaired	1200	1200	10,512,000

1 Potential throughput 1,200 pallets per hour

2 Assumed actual hourly pallet throughput as equal to potential hourly throughput

3 Assumed actual operating schedule of 16 hr/day, 260 days/yr

Coating Throughput Information

			Annual Throughput (gal/yr)
Paint Color	**Potential Throughput (gal/hr)**	**Projected Actual Throughput (gal/hr)**	**Potential to Emit**
Blue	13.20	13.20	115,632
White	1.20	1.20	10,512
Total	**14.40**	**14.40**	**126,144**

4 Assumed 11 gallons of blue per 1,000 pallets

5 Assumed 1 gallon of white per 1,000 palllets

VOC Emission Estimates

Paint Color	**Potential Emissions (lb/hr)**	**Potential Emissions (ton/yr)**
Blue	1.21	5.31
White	0.10	0.44
Totals	**1.31**	**5.75**

HAP Emission Estimates

Paint Color	**Potential Emissions (lb/hr)**	**Potential Emissions (ton/yr)**
Blue	0.00	0.00
White	0.00	0.00
Totals	**0.00**	**0.00**

PM/PM10 Emission Estimates

Particulate Capture Efficiency	100.0%	
Particulate Control Efficiency	99.48%	(Paint spray booth - HVLP dry filters as control)
Building Control Efficiency	90.00%	(Building estimated)
Estimated % overspray	30.0%	

Process	**Uncontrolled Potential Emissions (lb/hr)**	**Uncontrolled Potential Emissions (ton/yr)**	**Controlled Potential Emissions (lb/hr)**	**Controlled Potential Emissions (ton/yr)**
Blue [6]	12.17	53.30	0.06	0.28
White [7]	0.20	0.86	0.20	0.86
Totals	**12.37**	**54.16**	**0.26**	**1.14**

6 Blue paint is applied within a paint spray booth (SB-1)

7 White paint is applied within the building (SA-1), but not with a dedicated paintbooth.

Methodology

Blue - Maximum potential emissions (lb/hr) = throughput (gal/hr) * density * % solids * % overspray

White - Maximum potential emissions (lb/hr) = throughput (gal/hr) * density * % solids * % overspray * (1- % building control eff)

Blue - Maximum potenital emissions (ton/yr) = throughput (gal/yr) * density * % solids * % overspray

White - Maximum potenital emissions (ton/yr) = throughput (gal/yr) * density * % solids * % overspray * (1- % building control eff)

Blue - Controlled potential emissions (lb/hr) = throughput (gal/hr) * density * % solids * % overspray * (1- % paint booth capture eff * % paint booth control eff)

White - Controlled potential emissions (lb/hr) = throughput (gal/hr) * density * % solids * % overspray * (1- % building control eff)

Blue - Controlled potential emissions (ton/yr) = throughput (gal/yr) * density * % solids * % overspray * (1- % paint booth capture eff * % paint booth control eff)

White - Controlled potential emissions (ton/yr) = throughput (gal/yr) * density * % solids * % overspray * (1- % building control eff)

Appendix A: Emissions Calculations
Surface Coating - Line # 2 (Painting Wood Pallets)

Company Name: CLM Pallet Recycling, Inc.
Address City IN Zip: 2900 N Shadeland Ave, Indianapolis, IN 46219
Permit No.: M097-29030-00654
Reviewer: Christine L. Filutze
Date: 5/13/2010

Coating Information

				VOC Content, as Received		Solids Content, as Received		HAP Content, as Received	
Manufacturer	**Color**	**Product Code**	**Density (lb/gal)**	**VOC Content (g/L)**	**VOC Content (lb/gal)**	**% Solids (by weight)**	**% Solids (by volume)**	**HAP Content (g/L)**	**HAP Content (lb/gal)**
Kelly-Moore	Blue	0341-104	9.91	11	0.092	31.0%	0.00	0.00	0.000
Kelly-Moore	White	0341-100	11.41	10	0.083	48.0%	0.00	0.00	0.000

Pallet Throughput Information

			Annual Throughput (pallets/yr)
Unit	**Potential Throughput (pallets/hr)**	**Projected Actual Throughput (pallets/hr)**	**Potential to Emit**
Wood Pallets Painted / Repaired	380	380	3,328,800

1 Potential throughput 380 pallets per hour

2 Assumed actual hourly pallet throughput as equal to potential

3 Assumed actual operating schedule of 16 hr/day, 260 days/yr

Coating Throughput Information

			Annual Throughput (gal/yr)
Paint Color	**Potential Throughput (gal/hr)**	**Projected Actual Throughput (gal/hr)**	**Potential to Emit**
Blue	4.18	4.18	36,617
White	0.38	0.38	3,329
Total	**4.56**	**4.56**	**39,946**

4 Assumed 11 gallons of blue per 1,000 pallets

5 Assumed 1 gallon of white per 1,000 palllets

VOC Emission Estimates

Paint Color	**Potential Emissions (lb/hr)**	**Potential Emissions (ton/yr)**
Blue	0.38	1.68
White	0.03	0.14
Totals	**0.42**	**1.82**

HAP Emission Estimates

Paint Color	**Potential Emissions (lb/hr)**	**Potential Emissions (ton/yr)**
Blue	0.00	0.00
White	0.00	0.00
Totals	**0.00**	**0.00**

PM/PM10 Emission Estimates

Particulate Capture Efficiency	100.0%	
Particulate Control Efficiency	99.48%	(Paint spray booth - HVLP dry filters as control)
Estimated % overspray	30.0%	

Process	**Uncontrolled Potential Emissions (lb/hr)**	**Uncontrolled Potential Emissions (ton/yr)**	**Controlled Potential Emissions (lb/hr)**	**Controlled Potential Emissions (ton/yr)**
Blue [6]	3.85	16.88	0.02	0.09
White [7]	0.00	0.00	0.00	0.00
Totals	**3.85**	**16.88**	**0.02**	**0.09**

6 Blue paint is applied within a paint spray booth (SB-2)

7 White paint is applied using roll coat operation. No particulate emissions from Line 2 Stencil area (SA-2)

Methodology

Maximum potential emissions (lb/hr) = throughput (gal/hr) * density * % solids * % overspray

Maximum potenital emissions (ton/yr) = throughput (gal/yr) * density * % solids * % overspray

Controlled potential emissions (lb/hr) = throughput (gal/hr) * density * % solids * % overspray * (1- % paint booth capture eff * % paint booth control eff)

Controlled potential emissions (ton/yr) = throughput (gal/yr) * density * % solids * % overspray * (1- % paint booth capture eff * % paint booth control eff)

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: Hilton Hieneke
CLM Pallet Recycling
2900 N Shadeland
Indianapolis, IN 46219

DATE: August 10, 2010

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

SUBJECT: Final Decision
MSOP
097 - 29030 - 00654

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:
Kevin Zerr, Corporate Controller
Mr. Aaron Clotts AECOM
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.
Governor

Thomas W. Easterly
Commissioner

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

August 10, 2010

TO: Indianapolis Marion County Public Library

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

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

Applicant Name: CLM Pallet Recycling
Permit Number: 097 - 29030 - 00654

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	LPOGOST 8/10/2010 CLM Pallet Recycling, Inc. 097 - 29030 - 00654 final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

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2		Kevin Zerr Corporate Controller CLM Pallet Recycling, Inc. 338 S Arlington Ave., Ste 250 Indianapolis IN 46219 *(RO CAATS)*									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 *(Health Department)*									
4		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 *(Affected Party)*									
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 *(Local Official)*									
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 *(Local Official)*									
7		Ms. Jodi Perras Improving Kids Environment 1111 East 54th Street, Suite 212 Indianapolis IN 46220 *(Affected Party)*									
8		Mr. Aaron Clotts AECOM First Natl Bank Bldg 332 Minnesota St # E1000 St Paul MN 55101 *(Consultant)*									
9		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 *(Local Official)*									
10		Indianapolis Marion County Public Library 5420 East 38th Street Indianapolis IN 46218 *(Library)*									
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