



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: September 28, 2010

RE: Par-Kan Company / 085-29254-00012

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal

OFFICE OF AIR QUALITY

**Par-Kan Company
State Road 15 N
Silver Lake, Indiana 46982**

(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.

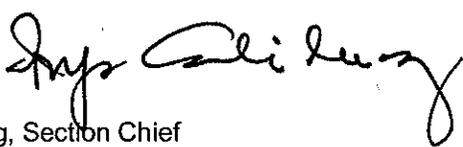
Operation Permit No.: M085-29254-00012	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 28, 2010 Expiration Date: September 28, 2020

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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 metal refuse container product fabrication and surface coating source.

Source Address:	State Road 15 N, Silver Lake, Indiana 46982
General Source Phone Number:	574-352-2141
SIC Code:	3491
County Location:	Kosciusko
Source Location Status:	Attainment for all 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) One (1) metal refuse painting station, identified as the Small Parts Paint Room, constructed in 1965, equipped with two (2) airless spray applicators, using dry filters for particulate control and exhausting to two (2) 30-inch fans, identified as F42 and F43, capacity: 9.375 units per hour.
- (b) One (1) Powder Coat Booth, enclosed, identified as PC001, approved for construction in 2010, with a maximum throughput capacity of two (2) pounds per hour, with a recirculation powder collection system, using high energy particulate air (HEPA) filters for control.
- (c) The following natural gas-fired combustion sources:
 - (1) One (1) boiler, exhausting to Stack S27, constructed after September 21, 1983, rated at 0.15 million British thermal units per hour.
 - (2) Six (6) unit heaters, exhausting to Stacks S3, S4, S5, S6, S22, and S23, rated at 0.15 million British thermal units per hour, each.
 - (3) One (1) heat make-up air unit, exhausting to Stack S8, rated at 0.24 million British thermal units per hour.
 - (4) One (1) heat make-up air unit, exhausting to Stack S7, rated at 3.0 million British thermal units per hour.
 - (5) One (1) unit heater, exhausting to Stack S9, rated at 0.175 million British thermal units per hour.
 - (6) One (1) heat make-up air unit, exhausting to Stack S26, rated at 0.125 million British thermal units per hour.
 - (7) Two (2) radiant tube heaters, rated at 0.15 million British thermal units per hour, each.
 - (8) One (1) make-up air unit, rated at 1.3 million British thermal units per hour.
 - (9) One (1) curing oven, identified as CUOV001, added in 2010, with a maximum heat input capacity of 3.0 MMBtu/hr, exhausting inside the building.

- (d) Forty (40) Deltaweld 452 welding units, capacity: 61.9 pounds of wire per hour, total, or 1.5475 pounds per hour maximum throughput capacity.

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, M085-29254-00012, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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.

- (c) 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.
- (d) 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 M085-29254-00012 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (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) 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

FACILITY OPERATION CONDITIONS

Emissions Unit Description: Surface Coating Operations

- (a) One (1) metal refuse painting station, identified as the Small Parts Paint Room, constructed in 1965, equipped with two (2) airless spray applicators, using dry filters for particulate control and exhausting to two (2) 30-inch fans, identified as F42 and F43, capacity: 9.375 metal units per hour.
- (b) One (1) Powder Coat Booth, enclosed, identified as PC001, approved for construction in 2010, with a maximum throughput capacity of two (2) pounds per hour, with a recirculation powder collection system, using high energy particulate air (HEPA) filters for control.

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

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the one (1) metal refuse painting station shall be controlled by a dry particulate filter, and the Permittee shall operate the control device at all times the operation is running and in accordance with manufacturer's specifications.
- (b) 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.
- (c) 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.
- (d) Particulate from the one (1) Powder Coating operation shall be controlled by a high energy particulate air (HEPA) filter, and the Permittee shall operate the control device at all times the operation is running and in accordance with manufacturer's specifications.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.3 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, the Permittee shall maintain records in accordance with (b) below.

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

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) The following natural gas-fired combustion sources:
- (1) One (1) boiler, exhausting to Stack S27, constructed after September 21, 1983, rated at 0.15 million British thermal units per hour.
 - (2) Six (6) unit heaters, exhausting to Stacks S3, S4, S5, S6, S22, and S23, rated at 0.15 million British thermal units per hour, each.
 - (3) One (1) heat make-up air unit, exhausting to Stack S8, rated at 0.24 million British thermal units per hour.
 - (4) One (1) heat make-up air unit, exhausting to Stack S7, rated at 3.0 million British thermal units per hour.
 - (5) One (1) unit heater, exhausting to Stack S9, rated at 0.175 million British thermal units per hour.
 - (6) One (1) heat make-up air unit, exhausting to Stack S26, rated at 0.125 million British thermal units per hour.
 - (7) Two (2) radiant tube heaters, rated at 0.15 million British thermal units per hour, each.
 - (8) One (1) make-up air unit, rated at 1.3 million British thermal units per hour.
 - (9) One (1) curing oven, identified as CUOV001, added in 2010, with a maximum heat input capacity of 3 MMBtu/hr, exhausting inside the building.
- (d) Forty (40) Deltaweld 452 welding units, capacity: 61.9 pounds of wire per hour, total, or 1.5475 pounds per hour maximum throughput capacity.

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983), the particulate emission rate from the one (1) boiler shall not exceed 0.6 pounds per million British thermal units, based on a total source heat input capacity of 0.15 million British thermal units per hour.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE 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:	Par-Kan Company
Address:	State Road 15 N
City:	Silver Lake, Indiana 46982
Phone #:	(260) 352 - 2141
MSOP #:	085-29254-00012

I hereby certify that Par-Kan Company is still in operation.
 no longer in operation.

I hereby certify that Par-Kan Company is in compliance with the requirements of MSOP 085-21993-00012.
 not in compliance with the requirements of MSOP 085-21993-00012.

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
FAX NUMBER - 317 233-5967**

**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 ?_____, 100TONS/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 PERM 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

Technical Support Document (TSD) for a
Minor Source Operating Permit Renewal

Source Background and Description
--

Source Name:	Par-Kan Company
Source Location:	State Road 15 N, Silver Lake, Indiana 46982
County:	Kosciusko County
SIC Code:	3491
Permit Renewal No.:	M085-29254-00012
Permit Reviewer:	Jack Harmon

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Par-Kan Company relating to the operation of a stationary metal refuse container product fabrication and surface coating source. On May 12, 2010, Par-Kan Company submitted an application to the OAQ requesting to renew its operating permit. Additional information was received on July 16, 2010, July 21, 2010, and July 22, 2010. Par-Kan Company was issued its first MSOP (M085-21993-00012) on April 12, 2006. Prior to the issuance of the MSOP in 2006, the source had been operating under a Part 70 operating permit (T085-15380-00012), issued January 21, 2003.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) metal refuse painting station, identified as the Small Parts Paint Room, constructed in 1965, equipped with two (2) airless spray applicators, using dry filters for particulate control and exhausting to two (2) 30-inch fans, identified as F42 and F43, capacity: 9.375 units per hour.
- (b) One (1) Powder Coat Booth, enclosed, identified as PC001, approved for construction in 2010, with a maximum throughput capacity of two (2) pounds per hour, with a recirculation powder collection system, using high energy particulate air (HEPA) filters for control.
- (c) The following natural gas-fired combustion sources:
 - (1) One (1) boiler, exhausting to Stack S27, constructed after September 21, 1983, rated at 0.15 million British thermal units per hour.
 - (2) Six (6) unit heaters, exhausting to Stacks S3, S4, S5, S6, S22, and S23, rated at 0.15 million British thermal units per hour, each.
 - (3) One (1) heat make-up air unit, exhausting to Stack S8, rated at 0.24 million British thermal units per hour.
 - (4) One (1) heat make-up air unit, exhausting to Stack S7, rated at 3.0 million British thermal units per hour.
 - (5) One (1) unit heater, exhausting to Stack S9, rated at 0.175 million British thermal units per hour.

- (6) One (1) heat make-up air unit, exhausting to Stack S26, rated at 0.125 million British thermal units per hour.
 - (7) Two (2) radiant tube heaters, rated at 0.15 million British thermal units per hour, each.
 - (8) One (1) make-up air unit, rated at 1.3 million British thermal units per hour.
 - (9) One (1) curing oven, identified as CUOV001, added in 2010, with a maximum heat input capacity of 3 MMBtu/hr, exhausting inside the building.
- (d) Forty (40) Deltaweld 452 welding units, capacity: 61.9 pounds of wire per hour, total, or 1.5475 pounds per hour maximum throughput capacity.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

The source has no emission units that were constructed and/or are operating without a permit.

Emission Units and Pollution Control Equipment Added, Removed, or Modified At the Source

The source has added the following emission units:

- (a) One (1) Powder Coat Booth, enclosed, identified as PC001, approved for construction in 2010, with a maximum throughput capacity of two (2) pounds per hour, with a recirculation powder collection system, using high energy particulate air (HEPA) filters for control.
- (b) One (1) curing oven, identified as CUOV001, added in 2010, with a maximum heat input capacity of 3.0 MMBtu/hr, exhausting inside the building.

The source has removed the following emission units:

- (a) One (1) primer coat spray booth, identified as Booth #30, constructed July 1, 1997, equipped with two (2) airless spray applicators, using double dry filters for particulate control and exhausting to four (4) 24-inch fans, identified as F35, F36, F37 and F38, and one (1) 16-inch fan, identified as F-39, capacity: 9.375 units per hour.
- (b) One (1) finish coat spray booth, identified as Booth #29, constructed July 1, 1997, equipped with two (2) airless spray applicators, using double dry filters for particulate control and exhausting to four (4) 24-inch fans, identified as F35, F36, F37 and F38, and one (1) 16-inch fan, identified as F-39, capacity: 9.375 units per hour.
- (c) The following natural gas-fired combustion sources:
 - (1) One (1) heat make-up air unit, exhausting to Stack S18, rated at 0.24 million British thermal units per hour, each.
 - (2) One (1) unit heater, exhausting to Stack S31, rated at 0.6 million British thermal units per hour.

The source has modified the following emission units:

- (a) Forty (40) Deltaweld 452 welding units, capacity: 61.9 pounds of wire per hour, total, or 1.5475 pounds per hour maximum throughput capacity. This is an increase in the number of units from thirty (30) in the previous permit.

Existing Approvals

Since the issuance of the MSOP (085-21993-00012) on April 12, 2006, the source has had no additional approvals.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Kosciusko County.

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

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Kosciusko 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. These rules became effective on 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**
Kosciusko County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance

Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	30.17
PM ₁₀	30.40
PM _{2.5}	30.40
SO ₂	0.02
NO _x	4.03
VOC	39.05
CO	3.38
Single HAP	1.4E-01 (Manganese)
Total HAP	2.10E-01

HAPs	tons/year
Manganese	1.4E-01
Hexane	7.596E-02
Total	2.10E-01

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants is less than 100 tons per year. However, PM₁₀, PM_{2.5}, and VOC are equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Potential to Emit After Issuance

The following table represents the unlimited/uncontrolled potential to emit of the entire source after issuance of the renewal:

(the remainder of this page intentionally left blank)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Worst Single HAP	Total HAPs
Small Parts Paint Room	28.51	28.51	28.51	0.00	0.00	38.83	0.00	0.00	0.00
Powder Coating Operations, PC001	0.09	0.09	0.09	0.00	0.00	0.00	0.00	0.00	0.00
Combustion Units	0.08	0.31	0.31	0.02	4.03	0.22	3.38	7.25E-02 (Hexane)	7.596E-02
Welding Operations	1.49	1.49	1.49	0.00	0.00	0.00	0.00	1.40E-01 (Manganese)	1.40D-01
Total PTE of Entire Source	30.17	30.40	30.40	0.02	4.03	39.05	3.38	1.40E-01 (Manganese)	2.10E-01
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

*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) This existing stationary source is not major for PSD because the emissions of each regulated pollutant are less than two hundred fifty (<250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

- (a) 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.

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 for this source.
- (b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c, Subpart Dc), are not included in this permit because the one (1) natural gas-fired boiler, rated at 0.15 million British thermal units per hour, has a heat input capacity less than ten (10) million British thermal units per hour.

National Emissions Standards for Hazardous Air Pollutants (NESHAP)

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.
- (b) The requirements of the National Emissions Standards for Hazardous Air Pollutants: Miscellaneous Metal Parts and Products Surface Coating (40 CFR Part 63, Subpart MMMM), are not included in the permit because this source is not a major source of HAPs.

- (c) The requirements of the National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart HHHHHH), are not included in the permit because the source does not perform stripping operations and because the surface coating at this source is not a spray application of coatings. Therefore, the requirements of 40 CFR Part 63, Subpart HHHHHH, do not apply.

State Rule Applicability - Entire Source

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

The one (1) metal refuse painting station, identified as the Small Parts Paint Room, was constructed in 1965. The other emission units at this source were constructed after August 7, 1977, and the source is not one of the 28 listed source categories under 326 IAC 2-2. The potential to emit of PM, PM₁₀, PM_{2.5}, NO_x, SO₂, CO and VOC are each less than two-hundred fifty (250) tons per year, therefore, the requirements of 326 IAC 2-2 are not applicable, and this source is a minor source with respect to this rule.

326 IAC 2-4.1 (New Source Toxics Control)

This source was constructed prior to July 27, 1997, 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, 326 IAC 2-4.1 is not applicable.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The one (1) boiler, exhausting to Stack S27, constructed after September 21, 1983, rated at 0.15 million British thermal units per hour, must comply with the requirements of 326 IAC 6-2-4. The emission limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The total boiler heat input capacity for the source is 0.15 million British thermal units per hour.

$$Pt = 1.09/(0.15)^{0.26} = 1.79 \text{ lb/mmBtu heat input}$$

For Q less than 10 million British thermal units per hour, Pt shall not exceed 0.6, therefore:

$$Pt = 0.6 \text{ lb/mmBtu heat input}$$

Based on Appendix A, the potential particulate emission rate is:

$$0.0012 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.0003 \text{ lb/hr}$$
$$(0.0003 \text{ lb/hr} / 0.15 \text{ mmBtu/hr}) = 0.002 \text{ lb PM per mmBtu}$$

The particulate emissions from the one (1) boiler are 0.002 pounds per million British thermal units, which is less than the allowable of 0.6 pounds per million British thermal units. Therefore, the one (1) boiler is in compliance with this rule.

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

Pursuant to 326 IAC 6-3-1(b)(14), the forty (40) Deltaweld 452 welding units are exempt from the requirements of 326 IAC 6-3-2, since the total potential particulate emissions of 0.340 pounds of particulate emission per hour are less than 0.551 pounds per hour. Therefore, the requirements of 326 IAC 6-3 do not apply.

326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies)

- (a) Particulate from the one (1) metal refuse painting station shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications, and at all times that the painting operation is running.
- (b) 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.
- (c) 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.
- (d) Particulate from the one (1) powder coating operation shall be controlled by a high energy particulate air (HEPA) filter, and the Permittee shall operate the control device in

accordance with manufacturer's specifications, and at all times that the powder coating operation is running.

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

The one (1) metal refuse painting station, identified as the Small Parts Paint Room, is not subject to 326 IAC 8-2-9, because it was constructed before July 1, 1990 and has the potential to emit VOC of less than one hundred tons per year. This requirement has been changed from the previous permit because the primer coat spray booth, identified as Booth #30, and the finish coat spray booth, identified as Booth #29, with 326 IAC 8-2-9 applicability in the previous permit, have been permanently removed from the source. Therefore, the requirements of 326 IAC 8-2-9 no longer apply to this source.

326 IAC 8-1-6 (New VOC Facilities; General Reduction Requirements)

The one (1) metal refuse painting station, identified as the Small Parts Paint Room, is not subject to 326 IAC 8-1-6, because it was constructed before January 1, 1980 and has the potential to emit VOC of less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 does not apply to this source. There are no other VOC rules that apply to this source.

Compliance Determination and Monitoring Requirements

Testing Requirements

All emission calculations were based on AP-42 emission factors; therefore, no testing is proposed.

Compliance Monitoring Requirements

The following monitoring requirements are applicable to this source:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Small Parts Paint Room Dry Filters	Operate	Daily	Operate at all times and within manufacturer's specifications	Response Steps
	Visible Emissions		No overspray	
Powder Coating Operation, PC001, High Energy Particulate Air (HEPA) Filters	Operate	Daily	Operate at all times and within manufacturer's specifications	Response Steps

These monitoring conditions are necessary because the filters for the Small Parts Paint Room and the Powder Coating operation must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-6.1 (MSOP).

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

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 May 12, 2010. Additional information was received on July 16, 2010, July 21, 2010, and July 22, 2010.

Conclusion

The operation of this stationary metal refuse container product fabrication and surface coating source shall be subject to the conditions of the attached MSOP Renewal No. 085-29254-00012.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jack Harmon 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) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.
- (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: Par-Kan Company
Address City IN Zip: State Road 15 N Silver Lake, Indiana 46982
Permit Number: 085-29254-00012
Pit ID: 085-00012
Reviewer: Jack Harmon
Date: July, 2010

Uncontrolled

<u>Emissions Units</u>	<u>PM</u>	<u>PM10</u>	<u>PM2.5</u>	<u>SO2</u>	<u>Nox</u>	<u>VOC</u>	<u>CO</u>	<u>HAP Single</u>	<u>HAP Total</u>	
Small Parts Paint Room	28.51	28.51	28.51	0.00	0.00	38.83	0.00	0.00	0.00	
Powder Coating Operation, PC001	0.09	0.09	0.09	0.00	0.00	0.00	0.00	0.00	0.00	
Combustion - Natural Gas Units	0.08	0.31	0.31	0.02	4.03	0.22	3.38	7.25E-02	7.596E-02	(Hexane)
Welding	1.49	1.49	1.49	0.00	0.00	0.00	0.00	1.40E-01	1.40E-01	(Manganese)
Totals (tons per year)	30.17	30.40	30.40	0.02	4.03	39.05	3.38	1.40E-01	2.10E-01	(Manganese)

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Par-Kan Company
Address City IN Zip: State Road 15 N Silver Lake, Indiana 46982
Permit Number: 085-29254-00012
Pit ID: 085-00012
Reviewer: Jack Harmon
Date: July, 2010

<u>Units</u>	<u>MMBtu/hr</u>
Boiler S27	0.15
Six heaters @0.15 ea	0.90
One air units @0.24 ea S8	0.24
One air unit S7	3.00
One heater S9	0.175
One air unit S26	0.125
Two tube heaters @ 0.15 ea	0.30
One air unit	1.30
Cur001, added in 2010	3.00
Total MMBtu/hr	9.19

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

9.19

80.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.08	0.31	0.02	4.03	0.22	3.38

*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

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

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

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

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Par-Kan Company

Address City IN Zip: State Road 15 N Silver Lake, Indiana 46982

Permit Number: 085-29254-00012

Plt ID: 085-00012

Reviewer: Jack Harmon

Date: July, 2010

		HAPs - Organics					Total HAP
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	8.453E-05	4.830E-05	3.019E-03	7.245E-02	1.369E-04	7.574E-02	

		HAPs - Metals					Total HAP
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		
Potential Emission in tons/yr	2.013E-05	4.428E-05	5.635E-05	1.530E-05	8.453E-05	2.206E-04	

Methodology is the same as page 1.

7.596E-02

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
Welding and Thermal Cutting**

Company Name: Par-Kan Company
Address City IN Zip: State Road 15 N Silver Lake, Indiana 46982
Permit Number: 085-29254-00012
Plt ID: 085-00012
Reviewer: Jack Harmon
Date: July, 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												
Dataweld 452 Units	40	1.5475		0.0055	0.0005			0.340	0.031	0.000	0	0.031 (Mn)
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
EMISSION TOTALS												
Potential Emissions lbs/hr								0.34				0.03
Potential Emissions lbs/day								8.17				0.74
Potential Emissions tons/year								1.49				0.14 (Mn)

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
 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
 AP-42, Chapter 12.19 for emission factors for welding.

**Appendix A: Emissions Calculations
Particulate
From Powder Coating Operation, added 2010**

**Company Name: Par-Kan Company
Address City IN Zip: State Road 15N, Silver Lake, Indiana 46982
Permit Number: 085-29254-00012
Reviewer: Jack Harmon**

Process	Maximum Usage (lbs/hr)	Transfer Efficiency (%)	Uncontrolled Particulate (lbs/hr)	Uncontrolled Particulate (tons/yr)	Control Efficiency (%)
Powder Coat Painting Operations PC01	2.00	99.00%	0.02	0.09	99%
Total				0.09	

* The powder coat painting booth is equipped with a powder coat recycling system.

Methodology

Uncontrolled Particulate (lbs/hr) = Maximum Usage (lbs/hr) * Transfer Efficiency (%)

Uncontrolled Particulate (tons/yr) = Maximum Usage (lbs/hr) * Transfer Efficiency (%) * 8760 (hrs/yr) * 1/2000 (ton/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: David Caldwell
Par-Kan Company
SR 15 N
Silver Lake, IN 46982

DATE: September 28, 2010

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

SUBJECT: Final Decision
MSOP
085-29254-00012

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

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

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

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

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

September 28, 2010

TO: Warsaw Community Public Library

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

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

Applicant Name: Par-Kan Company
Permit Number: 085-29254-00012

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 9/28/2010 Par-Kan Company 085-29254-00012 (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		

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1		David Caldwell Par-Kan Company SR 15 N Silver Lake IN 46982 (Source CAATS)										
2		Mr. Charles L. Berger Attorney Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
3		Warsaw Community Public Library 310 E Main St Warsaw IN 46580-2882 (Library)										
4		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)										
5		Dennis Barnes Barnes Consulting Services, LLC 111 S. High Street, Unit B Warsaw IN 46580 (Consultant)										
6		Silver Lake Town Council P.O. Box 159 Silver Lake IN 46982 (Local Official)										
7		Mr. Tim Thomas c/o Boilermakers Local 374 6333 Kennedy Ave. Hammond IN 46333 (Affected Party)										
8		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 (Health Department)										
9												
10												
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