



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: March 25, 2011

RE: LaGrange Coatings Company / 087-29743-00075

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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**New Source Construction and Minor Source Operating
Permit
OFFICE OF AIR QUALITY**

**LaGrange Coatings Company
1439 Industrial Drive North
LaGrange, Indiana 46761**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 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.

NSR/MSOP No.: M087-29743-00075	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 25, 2011 Expiration Date: March 25, 2016

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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 coatings manufacturing and plastic, wood and metal surface coating plant.

Source Address:	1439 Industrial Drive North, LaGrange, Indiana 46761
General Source Phone Number:	260-499-5223
SIC Code:	2851
County Location:	LaGrange
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 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) Coatings Manufacturing Line, identified as CL1, approved for construction in 2011, with a maximum capacity of 354 pounds of coating per hour, using no controls, and exhausting inside the plant. The paint manufacturing process is a mechanical blending and mixing batch process, consisting of the following:
 - (1) Two (2) 2,500 gallon filling tanks, each with a maximum throughput capacity of 354 lb/hr;
 - (2) Four (4) mixing/blending tanks, each with a maximum throughput capacity of 354 lb/hr;
 - (3) Two (2) high-speed mixers; and
 - (4) One (1) dry handling system, with a maximum throughput capacity of 354 lb/hr.
- (b) One (1) Automated Coating Line, identified as PL1, approved for construction in 2011, with a maximum throughput capacity of 99 units per hour, used to coat metal substrate, except metal furniture, using an airless HVLP spray application method, using dry filters as control, and exhausting through stack SVPL1. Clean-up is done using a non-VOC solvent.
- (c) Two (2) Coating Booths, identified as B1 and B2, constructed in 2010, with a maximum throughput capacity of 20 units per hour each, used to coat plastic or wood substrate using an airless HVLP spray application method, using dry filters as control, and exhausting through stacks SVB1 and SVB2, respectively; and
- (d) Four (4) natural gas-fired units, consisting of the following:
 - (1) One (1) natural gas-fired make-up air unit, identified as AM1, approved for construction in 2011, with a maximum heat input capacity of .017 MMBtu/hr, exhausting through stack SVAM1;
 - (2) One (1) natural gas-fired Drying Oven, identified as DO1, approved for construction in 2011, with a maximum heat input capacity of 0.30 MMBtu/hr, exhausting through stack

SVDO1; and

- (3) Four (4) natural gas-fired Tube Heaters, identified as H1 through H4, approved for construction in 2011, with a maximum heat input capacity of 0.06 MMBtu/hr each, or 0.24 MMBtu/hr combined, exhausting through stacks SVH1 through SVH4, respectively.
- (e) Insignificant Activities, including the following:
- (1) Storage tanks for storing VOC and HAP materials, having a storage capacity of less than 1,000 gallons;
 - (2) Air compressor and pneumatically-operated equipment, including hand tools;
 - (3) Pressurized storage tanks of LP gas;
 - (4) Various storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP; and
 - (5) Mobile floor sweepers and floor scrubbers.

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

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

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

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M087-29743-00075, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 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.10 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.11 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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M087-29743-00075 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.13 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.14 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.15 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.16 Source Modification Requirement

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

B.17 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.18 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.19 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.20 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 construct and 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) 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) One (1) Coatings Manufacturing Line, identified as CL1, approved for construction in 2011, with a maximum capacity of 354 pounds of coating per hour, using no controls, and exhausting inside the plant. The paint manufacturing process is a mechanical blending and mixing batch process, consisting of the following:
 - (1) Two (2) 2,500 gallon filling tanks, each with a maximum throughput capacity of 354 lb/hr;
 - (2) Four (4) mixing/blending tanks, each with a maximum throughput capacity of 354 lb/hr;
 - (3) Two (2) high-speed mixers; and
 - (4) One (1) dry handling system, with a maximum throughput capacity of 3.54 lb/hour.
- (b) One (1) Automated Coating Line, identified as PL1, approved for construction in 2011, with a maximum throughput capacity of 99 units per hour, used to coat metal substrate, except metal furniture, using an airless HVLP spray application method, using dry filters as control, and exhausting through stack SVPL1. Clean-up is done using a non-VOC solvent.
- (c) Two (2) Coating Booths, identified as B1 and B2, constructed in 2010, with a maximum throughput capacity of 20 units per hour each, used to coat plastic or wood substrate using an airless HVLP spray application method, using dry filters as control, and exhausting through stacks SVB1 and SVB2, respectively; and
- (d) Four (4) natural gas-fired units, consisting of the following:
 - (1) One (1) natural gas-fired make-up air unit, identified as AM1, approved for construction in 2011, with a maximum heat input capacity of .017 MMBtu/hr, exhausting through stack SVAM1;
 - (2) One (1) natural gas-fired Drying Oven, identified as DO1, approved for construction in 2011, with a maximum heat input capacity of 0.30 MMBtu/hr, exhausting through stack SVDO1; and
 - (3) Four (4) natural gas-fired Tube Heaters, identified as H1 through H4, approved for construction in 2011, with a maximum heat input capacity of 0.06 MMBtu/hr each, or 0.24 MMBtu/hr combined, exhausting through stacks SVH1 through SVH4, respectively.
- (e) Insignificant Activities, including the following:
 - (1) Storage tanks for storing VOC and HAP materials, having a storage capacity of less than 1,000 gallons;
 - (2) Air compressor and pneumatically-operated equipment, including hand tools;
 - (3) Pressurized storage tanks of LP gas;
 - (4) Various storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP; and
 - (5) Mobile floor sweepers and floor scrubbers.

(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 6-3-2] [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2, particulate emissions from the each of the four mixing/blending tanks, fed by the filling tanks and the dry material system, within the Coatings Manufacturing Line, identified as CL1, shall not exceed 1.29 lb/hr. when operating at a process weight rate of 0.177 tons per hour, or 354 pounds per hour, as calculated from the following equation:

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

Where

E = rate of emission in pounds per hour; and
P = Process weight rate in tons per hour.

- (b) Pursuant to 326 IAC 6-3-2(d), the following provisions shall apply to the automated metal coating line, identified as PL1, and the two (2) coating booths, identified as B1 and B2:
- (1) Particulate from the one (1) automated paint line, identified as PL1 and the two (2) paint booths, identified as B1 and B2, shall each be controlled by a dry particulate filter, and the source shall operate the control device at all times the operation is running and in accordance with manufacturer's specifications.
 - (2) 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:
 - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (3) 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 must be maintained for five (5) years.

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.

D.1.3 Surface Coating VOC Emissions Limitations [326 IAC 8-2-9] [326 IAC 8-2-9(f)]

- (a) Pursuant to 326 IAC 8-2-9, the Automated Coating Line (PL1) shall not discharge into the atmosphere VOC in excess of 3.5 pounds VOC per gallon of coatings, less water, as delivered to the applicator.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds

Compliance with the VOC content contained in Condition D.1.3 shall be determined using formulation data supplied by the coating manufacturer. However, IDEM OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Recordkeeping Requirement

To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (a) through (b) below. Records maintained for (a) and (b) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emissions limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (a) The VOC content of each coating material and solvent used.
- (b) The amount of coating material and solvent less water used on a monthly basis.
 - (1) Records shall include purchase orders, invoices, and materials safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) Solvent usage records shall differentiate between those added coatings and those used as cleanup solvents.

**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:	LaGrange Coatings Company
Address:	1439 Industrial Drive North
City:	LaGrange, Indiana 46761
Phone #:	260-499-5223
MSOP #:	M087-29743-00075

I hereby certify that LaGrange Coatings Company is :

still in operation.

no longer in operation.

I hereby certify that LaGrange Coatings Company is :

in compliance with the requirements of MSOP M087-29743-00075.

not in compliance with the requirements of MSOP M087-29743-00075.

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:

Mail to: Permit Administration and Support Section

Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

LaGrange Coatings Company
1439 Industrial Drive North
LaGrange, Indiana 46761

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that LaGrange Coatings Company 1439 Industrial Drive North, LaGrange, Indiana 46761, completed construction of the coatings manufacturing and plastic and metal surface coating plant. on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 28, 2010 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M087-29743-00075, Plant ID No. 087-00075 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

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

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

Source Background and Description

Source Name:	LaGrange Coatings Company
Source Location:	1439 Industrial Drive North, LaGrange, Indiana 46761
County:	LaGrange
SIC Code:	2851
Operation Permit No.:	087-29743-00075
Permit Reviewer:	Jack Harmon

On February 14, 2011, the Office of Air Quality (OAQ) had a notice published in LaGrange Standard, LaGrange, Indiana, stating that LaGrange Coatings Company had applied for a New Source Construction and New Source Review related to the construction and operation of a stationary coatings manufacturing and plastic, wood and metal parts surface coating plant. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit (MSOP) 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

No comments were received during the public notice period.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**. 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 as appropriate.

- (a) IDEM OAQ has decided to clarify emissions calculations in Appendix A of the original Technical Support Document for the Coating Manufacturing Line CL-1, to provide more consistent throughput capacities, and to adjust two emission factors. Specifically, throughput for the Paint Filling operation was changed from 240 pounds of coating per hour to 354 pounds of coating per hour to be consistent with the other components of the production line. The throughput of the Paint production line for PM calculations was also changed from 141 pounds of coating per hour to 354 pounds of coating per hour to be consistent with the other components of the production line. The emission factor for the dry material handling operation was changed from 5.5 pounds PM per ton of material to 20 pounds PM per ton of material to be consistent with the rest of the production line as described in EPA's AP-42 Chapter 6.4-1, Paint and Varnish Production, 1995. The result of these changes was a minor increase in the potential to emit PM, PM10, PM2.5 and VOC. Detailed calculations are shown in Appendix A of this Addendum to the Technical Support Document.

The new Potential to Emit of the Entire Source is shown in the table below, incorporating the above changes. Deleted values are shown as ~~strikeouts~~ and new values **bolded**.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

The result of these changes had no effect on the permit level determination, and the source will remain an MSOP. Therefore, no changes were made to the permit.

- (b) IDEM OAQ has decided to evaluate two federal rules for the surface coating operation and the coating manufacturing operation at this source.
- (1) New Source Performance Standards (NSPS): The source is not subject to the requirements of 40 CFR 60, Subpart EE, New Source Performance Standards for Surface Coating of Metal Furniture, because the source will not coat metal furniture in its facility. Therefore, the requirements of 40 CFR 60, Subpart EE do not apply.
 - (2) National Emission Standards for Hazardous Air Pollutants (NESHAP): The source is not subject to the requirements of 40 CFR 63, Subpart HHHHH, National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, because the source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63 Subpart HHHHH do not apply.
 - (3) There are no other New Source Performance Standards or National Emission Standards for Hazardous Air Pollutants applicable to this source.

Since there are no other rules applied in this Addendum to the Technical Support Document, no changes have been made to the permit.

- (c) IDEM OAQ has decided to make a change in the description of the Automated Coating Line Line to indicate that the source will not surface coat metal furniture, as discussed in (b)(1) above, and to indicate the changes in throughput capacities of the Coatings Manufacturing Line described in (a) above.

Sections A.2 and D.1 of the permit have been changed to reflect these changes.

The permit has been changed as follows, with deleted language as ~~strikeouts~~ and new language **bolded**.

A.2 Emission Units and Pollution Control Devices

- (a) One (1) Coatings Manufacturing Line, identified as CL1, approved for construction in 2011, with a maximum capacity of 354 pounds of coating per hour, using no controls, and exhausting inside the plant. The paint manufacturing process is a mechanical blending and mixing batch process, consisting of the following:
- (1) Two (2) 2,500 gallon filling tanks, **each with a maximum throughput capacity of 354 lb/hr;**
 - (2) Four (4) mixing/blending tanks, each with a maximum throughput capacity of 354 lb/hr;
 - (3) Two (2) high-speed mixers; and

- (4) One (1) dry handling system, with a maximum throughput capacity of ~~1,240,416 pounds per year, which is 620.21 tons per year, or 0.071 tons per hour~~ **354 lb/hr**.
- (b) One (1) Automated Coating Line, identified as PL1, approved for construction in 2011, with a maximum throughput capacity of 99 units per hour, used to coat metal substrate, **except metal furniture**, using an airless HVLP spray application method, using dry filters as control, and exhausting through stack SVPL1. Clean-up is done using a non-VOC solvent.

D.1 Emission Unit Operation Conditions

- (a) One (1) Coatings Manufacturing Line, identified as CL1, approved for construction in 2011, with a maximum capacity of 354 pounds of coating per hour, using no controls, and exhausting inside the plant. The paint manufacturing process is a mechanical blending and mixing batch process, consisting of the following:
- (1) Two (2) 2,500 gallon filling tanks, **each with a maximum throughput capacity of 354 lb/hr**;
 - (2) Four (4) mixing/blending tanks, each with a maximum throughput capacity of 354 lb/hr;
 - (3) Two (2) high-speed mixers; and
 - (4) One (1) dry handling system, with a maximum throughput capacity of ~~1,240,416 pounds per year, which is 620.21 tons per year, or 0.071 tons per hour~~ **354 lb/hr**.
- (b) One (1) Automated Coating Line, identified as PL1, approved for construction in 2011, with a maximum throughput capacity of 99 units per hour, used to coat metal substrate, **except metal furniture**, using an airless HVLP spray application method, using dry filters as control, and exhausting through stack SVPL1. Clean-up is done using a non-VOC solvent.

IDEM Contact

- (a) Questions regarding this proposed New Source Construction and New Source Review MSOP 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 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

Appendix A: Emissions Calculations										Page 1 of 6 ATSD App. A	
Emissions Summary											
Company Name:		LaGrange Coatings Company									
Address City IN Zip:		1439 Industrial Drive North, LaGrange, Indiana 46761									
Permit No.:		087-29743-00075									
Permit Writer:		Jack Harmon									
Process	tons/year										
	PM	PM ₁₀	PM _{2.5}	VOC	NOx	CO	SO ₂	HAPs	HAP Name		
Coatings Manufacturing Line CL1	21.82	21.82	21.82	27.15	0.00	0.00	0.00	1.054	Xylene		
Automated Metal Coating Line PL1	5.26	5.26	5.26	10.09	0.00	0.00	0.00	0.00			
Plastic Coating Booths B1 & B2	2.89	2.89	2.89	21.82	0.00	0.00	0.00	5.61	Toluene		
Natural Gas Combustion	5.909E-03	2.363E-02	2.000E-02	1.710E-02	3.110E-01	2.612E-01	1.866E-03	5.598E-03	Hexane		
Traffic emissions	8.80E-03	1.71E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00			
Total Uncontrolled Emissions	29.98	29.99	29.99	59.08	0.31	0.26	0.00	6.14			
Individual HAP Emissions											
Xylene	Toluene	Formaldehyde	Benzene	Methanol	MIBK	Ethyl Benzene	Total				
1.054	5.606	0.000	0.000	0.000	0.000	0.000	6.139				
"Worst Case" Individual HAP is Toluene											

Appendix A: Emissions Calculations

VOC/HAP and Particulate

Surface Coating Operations

Automated Metal Coating Line (PL1)

Company Name: LaGrange Coatings Company
Address City IN Zip: 1439 Industrial Drive North, LaGrange, Indiana 46761
Permit No.: 087-29743-00075
Permit Writer: Jack Harmon

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water/Exempt	Weight % Organics	Volume % Water	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Material Usage (gal/hr)	Material Usage (lb/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*			
WR Gray Shop Primer 72-52	9.51	75.00%	63.00%	12.00%	59.20%	25.00%	0.0204	99.000	2.80	1.14	2.02	19.21	2.30	55.31	10.09	5.26	4.56	75%			
Potential Emission Rates - Coating Room																					
AND																					
Acetone and Water for Cleanup	6.69	100.00%	0.00%	0.00%	0.00%	0.00%	0.0005	99.000	0.00	0.00	0.05	0.33	0.00	0.00	0.00	0.00	0.00	100%			
Total Potential Emission Rates for Cleanup Solvents																					
This facility uses one coating and one solvent.																					
Potential Emission Rates - Coating Room													2.30	55.31	10.09	5.26					
Cleanup Solvents													0.00	0.00	0.00	0.00					
Coating + Cleanup Solvent = Potential to Emit													2.30	55.31	10.09	5.26					
Particulate Matter Emission Rates (lb/hr)															Precontrol PM/PM10		1.20	lb/hr			
Particulate Matter Emission Rates (lb/hr)															Postcontrol PM/PM10		0.25	lb/hr			
*Application and Manual Cleaning - Mutually Exclusive Coating Application																					
METHODOLOGY																					

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

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

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

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

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

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

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

Total = Coating + Sum of all solvents used

HAZARDOUS AIR POLLUTANTS

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
				Ethyl Benzene	Formaldehyde	MIBK	Methanol	Toluene	Xylene							
WR Gray Shop Primer 72-52	9.51	0.0204	99.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Potential Emission Rates - Coating Room																
Acetone and Water for Cleanup	6.69	0.0005	99.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating + Cleanup Solvent = Potential to Emit																
Coating + Cleanup Solvent = Potential to Emit																
HAP Emission Rates																
0.00 0.00 0.00 0.00 0.00 0.00 0.00																
METHODOLOGY																
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs																

Appendix A: Emissions Calculations

**VOC/HAP and Particulate
Surface Coating Operations
Plastic Coating Booths (B1&B2)**

Company Name: LaGrange Coatings Company
Address City IN Zip: 1439 Industrial Drive North, LaGrange, Indiana 46761
Permit No.: 087-29743-00075
Permit Writer: Jack Harmon

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Material Usage (gal/hr)	Material Usage (lb/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*				
Booth 1																						
GAC Black 10003	7.51	64.70%	0.00%	64.70%	0.00%	11.40%	0.0249	20.000	4.86	4.86	0.50	3.74	2.42	58.07	10.60	1.45	42.62	75%				
Potential Emission Rates - Coating Room													2.42	58.07	10.60	1.45						
AND																						
Toluene for Cleanup	7.26	100.00%	0.00%	100.00%	0.00%	0.00%	0.0005	20.000	7.26	7.26	0.01	0.07	0.07	1.71	0.31	0.00	0.00	100%				
Total Potential Emission Rates for Cleanup Solvents													0.07	1.71	0.31	0.00						
Booth 2																						
GAC Black 10003	7.51	64.70%	0.00%	64.70%	0.00%	11.40%	0.0249	20.000	4.86	4.86	0.50	3.74	2.42	58.07	10.60	1.45	42.62	75%				
Potential Emission Rates - Coating Room													2.42	58.07	10.60	1.45						
AND																						
Toluene for Cleanup	7.26	100.00%	0.00%	100.00%	0.00%	0.00%	0.0005	20.000	7.26	7.26	0.01	0.07	0.07	1.71	0.31	0.00	0.00	100%				
Total Potential Emission Rates for Cleanup Solvents													0.07	1.71	0.31	0.00						
This facility uses one coating and one solvent.																						
Potential Emission Rates - Coating Room													4.84	116.15	21.20	2.89						
Cleanup Solvents													0.14	3.42	0.62	0.00						
Coating + Cleanup Solvent = Potential to Emit													4.98	119.56	21.82	2.89						
Particulate Matter Emission Rates (lb/hr)																			0.66	lb/hr		
Particulate Matter Emission Rates (lb/hr)																			0.14	lb/hr		
*Application and Manual Cleaning - Mutually Exclusive Coating Application																						

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Coating + solvents used

HAZARDOUS AIR POLLUTANTS

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Formaldehyde	Weight % MIBK	Weight % Methanol	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)		
GAC Black 10003	7.51	0.0249	40.000	0.00%	0.00%	0.00%	0.00%	15.21%	0.00%	0.00	0.00	0.00	0.00	4.98	0.00	4.98		
Potential Emission Rates - Coating Room											0.00	0.00	0.00	0.00	4.98	0.00	4.98	
Toluene for Cleanup											0.00	0.00	0.00	0.00	0.62	0.00	0.62	
Coating + Cleanup Solvent = Potential to Emit											0.00	0.00	0.00	0.00	0.62	0.000	0.623	
Coating + Cleanup Solvent = Potential to Emit											0.00	0.00	0.00	0.00	0.62	0.00	0.623	
HAP Emission Rates											0.00	0.00	0.00	0.00	5.61	0.00	5.61	Toluene

METHODOLOGY

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

Appendix A: Emissions Calculations						Page 4 of 6 ATSD App. A	
Coatings Manufacturing Line (CL1)							
Company Name: LaGrange Coatings Company							
Address City IN Zip: 1439 Industrial Drive North, LaGrange, IN 46761							
Permit No.: 087-29743-00075							
Permit Writer: Jack Harmon							
Paint Filling (Final Packaging)							
VOC							
Facility Group	EF (lb/ton)	Capacity (lbs of coating per/hr)	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)		
Two (2) 2,500 Gallon Filling Tanks	30	354	34.40%	1.83	8.0		
Emission factors from AP-42, Chapter 6.4-1, Paint and Varnish Manufacturing, 1995.							
					Total:	8.001	
Paint Production (Two Worst Case Coatings)							
VOC							
LC-5101 Undercoating	EF (lb VOC/lb solvent)	Capacity (lbs of coating per/hr)	% Solvent Content	PTE (lbs/hr)	PTE (tons/yr)		
Four (4) mixing/blending Tanks, Two (2) High Speed Mixers	0.034	354	16.74	2.0	8.8		
LC-4221 Black Enamel	EF (lb VOC/lb solvent)	Capacity (lbs of coating per/hr)	% Solvent Content	PTE (lbs/hr)	PTE (tons/yr)		
Four (4) mixing/blending Tanks, Two (2) High Speed Mixers	0.034	354	36.2	4.4	19.1		
*Each coating is mutually exclusive							
Emission factors from EPA Emission Inventory Improvement Program (EIIP), Volume II, Chapter 8.5-2, Methods for Estimating Air Emissions from Ink, Paint, and other Coating Manufacturing Facilities, February, 2005.							
HAPs							
LC-5101 Undercoating	Max. Weight % Xylene	Max. Weight % Toluene	Max. Weight % Total HAPs	EF (lb VOC/lb solvent)	PTE Xylene (tons/yr)	PTE Toluene (tons/yr)	PTE HAP (tons/yr)
Two (2) Filling Tanks, Four (4) Mixing/blending Tanks, Two (2) High Speed Mixers	2.0%	0.0%	2.0%	0.034	1.05	0.00	1.0544
LC-4221 Black Enamel	Max. Weight % Xylene	Max. Weight % Toluene	Max. Weight % Total HAPs	EF (lb VOC/lb solvent)	PTE Xylene (tons/yr)	PTE Toluene (tons/yr)	PTE HAP (tons/yr)
Two (2) Filling Tanks, Four (4) Mixing/blending Tanks, Two (2) High Speed Mixers	1.0%	0.0%	1.0%	0.034	0.53	0.00	0.5272
*Each coating is mutually exclusive							
Emission factors from EPA Emission Inventory Improvement Program (EIIP), Volume II, Chapter 8.5-2, Methods for Estimating Air Emissions from Ink, Paint, and other Coating Manufacturing Facilities, February, 2005.							
Worst Case VOC Totals							
Facility Group	EF (lb VOC/lb solvent)	Capacity (lbs of coating per/hr)	% Solvent content	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)	
Four (4) mixing/blending Tanks, Two (2) High Speed Mixers	0.034	354	36.2	36.20%	4.4	19.1	
					Total:	19.084	
Emission factors from EPA Emission Inventory Improvement Program (EIIP), Volume II, Chapter 8.5-2, Methods for Estimating Air Emissions from Ink, Paint, and other Coating Manufacturing Facilities, February, 2005.							
Worst Case HAP Totals							
Facility Group	Max. Weight % Xylene	Max. Weight % Toluene	Max. Weight % Total HAPs	EF (lb VOC/lb solvent)	PTE Xylene (tons/yr)	PTE Toluene (tons/yr)	PTE HAP (tons/yr)
Two (2) Filling Tanks, Four (4) Mixing/blending Tanks, Two (2) High Speed Mixers	2.0%	0.0%	2.0%	0.034	0.53	0.00	0.5272
					Total:	0.527	
Emission factors from EPA Emission Inventory Improvement Program (EIIP), Volume II, Chapter 8.5-2, Methods for Estimating Air Emissions from Ink, Paint, and other Coating Manufacturing Facilities, February, 2005.							
PM and PM-10							
Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % Solids	PTE (lbs/hr)	PTE (tons/yr)		
Two (2) Filling Tanks, Four (4) Mixing/blending Tanks, Two (2) High Speed Mixers	20	354	40.60%	1.44	6.3		
Emission factors from AP-42, Chapter 6.4-1, Paint and Varnish Manufacturing, 1995.							
					Total:	6.3	
Dry Material Handling							
Capacity (lbs/yr)	PM Emission Factor (lbs PM/ton material)	PM Emissions (lbs/hr)	PM Emissions (tons/yr)				
3101040	20	3.540	15.51				
Emission factors from AP-42, Chapter 6.4-1, Paint and Varnish Manufacturing, 1995.							
					Total PM, PM10	21.8	(6.3+15.51+0.61)
VOC							
Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)	Total VOC	
Laboratory	30	0.936	100.00%	0.014	0.061	27.1	(8.0+19.1+0.061)
Emission factors from AP-42, Chapter 6.4-1, Paint and Varnish Manufacturing, 1995.							
PM and PM-10							
Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % Solids	PTE (lbs/hr)	PTE (tons/yr)		
Laboratory	20	0.936	47.60%	0.004	0.020		
Emission factors from AP-42, Chapter 6.4-1, Paint and Varnish Manufacturing, 1995.							
Methodology							
Potential to Emit VOC = Emission Factor x Capacity lbs/hr / 2000 lb/ton x Maximum weight % of VOC							
Potential to Emit PM = Emission Factor x Capacity lbs/hr / 2000 lb/ton x Maximum weight % of Solids							

Appendix A: Emission Calculations

Fugitive Dust Emissions - Paved Roads

Company Name: LaGrange Coatings Company
Address City IN Zip: 1439 Industrial Drive North, LaGrange, Indiana 46761
Permit No.: 087-29743-00075
Permit Writer: Jack Harmon

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering Plant) (one way trip)	1.0	4.0	4.0	10.0	50.0	100.0	0.019	0.1	27.7
Vehicle (leaving plant) (on way trip)	1.0	4.0	4.0	10.0	50.0	100.0	0.019	0.1	27.7
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
Total			8.0		100.0			0.2	55.3

Average Vehicle Weight Per Trip = 12.5 tons/trip
 Average Miles Per Trip = 0.02 miles/trip

Unmitigated Emission Factor, Ef = $k * (sL/2)^{0.65} * (W/3)^{1.5} * C$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	12.5	12.5	10.0	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00047	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m ² = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
 where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.32	0.06	0.01	lb/mile
Mitigated Emission Factor, Eext =	0.29	0.06	0.01	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.01	1.71E-03	1.72E-04	0.01	1.56E-03	1.57E-04	0.00	7.81E-04	7.85E-05

Methodology

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
- Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
- Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
- Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
- Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
- Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
- Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
- Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and New Source Review and Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	LaGrange Coatings Company
Source Location:	1439 Industrial Drive North, LaGrange, Indiana 46761
County:	LaGrange
SIC Code:	2851
Operation Permit No.:	087-29743-00075
Permit Reviewer:	Jack Harmon

On September 28, 2010, the Office of Air Quality (OAQ) received an application from LaGrange Coatings, Company related to the construction and operation of a stationary coatings manufacturing and plastic, wood and metal parts surface coating plant. Additional information was received on October 21, November 18, November 30, and December 13, 2010.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 LaGrange 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
LaGrange 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) This stationary source uses chemicals and dry pigments and applies mechanical means in its process of manufacturing paint at this facility. Therefore, it is considered to be a chemical processing plant, and, as such, is considered one of the twenty-eight source categories listed in 326 IAC 2-7-1(22)(xx).

Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by LaGrange Coatings Company on September 28, 2010, relating to the construction and operation of a new stationary coatings manufacturing and metal, wood and plastic parts surface coating plant. The plant will consist of a paint production process, and automated metal paint line, two paint booths, combustion units consisting of a drying oven, make-up air unit, and several tube heaters. The total potential to emit from the entire source has been calculated for each criteria pollutant, and is shown in Appendix A of this technical support document. The permit level is discussed in the Permit Level Determination section below.

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

- (a) One (1) Coatings Manufacturing Line, identified as CL1, approved for construction in 2011, with a maximum capacity of 354 pounds of coating per hour, using no controls, and exhausting inside the plant. The paint manufacturing process is a mechanical blending and mixing batch process, consisting of the following:
- (1) Two (2) 2,500 gallon filling tanks;
 - (2) Four (4) mixing/blending tanks, each with a maximum throughput capacity of 354 lb/hr;
 - (3) Two (2) high-speed mixers; and
 - (4) One (1) dry handling system, with a maximum throughput capacity of 1,240,416 pounds per year, which is 620.21 tons per year, or 0.071 tons per hour.
- (b) One (1) Automated Coating Line, identified as PL1, approved for construction in 2011, with a maximum throughput capacity of 99 units per hour, used to coat metal substrate using an airless HVLP spray application method, using dry filters as control, and exhausting through stack SVPL1. Clean-up is done using a non-VOC solvent.
- (c) Two (2) Coating Booths, identified as B1 and B2, constructed in 2010, with a maximum throughput capacity of 20 units per hour each, used to coat plastic or wood substrate using an airless HVLP spray application method, using dry filters as control, and exhausting through stacks SVB1 and SVB2, respectively; and
- (d) Four (4) natural gas-fired units, consisting of the following:

- (1) One (1) natural gas-fired make-up air unit, identified as AM1, approved for construction in 2011, with a maximum heat input capacity of .017 MMBtu/hr, exhausting through stack SVAM1;
 - (2) One (1) natural gas-fired Drying Oven, identified as DO1, approved for construction in 2011, with a maximum heat input capacity of 0.30 MMBtu/hr, exhausting through stack SVDO1; and
 - (3) Four (4) natural gas-fired Tube Heaters, identified as H1 through H4, approved for construction in 2011, with a maximum heat input capacity of 0.06 MMBtu/hr each, or 0.24 MMBtu/hr combined, exhausting through stacks SVH1 through SVH4, respectively.
- (e) Insignificant Activities, including the following:
- (1) Storage tanks for storing VOC and HAP materials, having a storage capacity of less than 1,000 gallons;
 - (2) Air compressor and pneumatically-operated equipment, including hand tools;
 - (3) Pressurized storage tanks of LP gas;
 - (4) Various storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP; and
 - (5) Mobile floor sweepers and floor scrubbers.

Enforcement Issues

IDEM is aware that the two (2) Coating Booths, identified as B1 and B2, have been constructed and/or operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP
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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	10.70
PM10 ⁽¹⁾	10.71
PM2.5	14.13
SO2	0.00
NO _x	0.31
VOC	51.01
CO	0.26

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

HAPs	Potential To Emit (tons/year)
Toluene	5.61
Xylene	0.53
TOTAL HAPs	6.14

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOCs 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.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Coatings Manufacturing Line CL1	2.54	2.54	2.54	0.00	0.00	19.08	0.00	0.53	0.53 (Xylene)
Automated Coating Line PL1	5.26	5.26	5.26	0.00	0.00	10.09	0.00	0.00	0.00
Coating Booths B1 and B2	2.89	2.89	2.89	0.00	0.00	21.82	0.00	5.61	5.61 (Toluene)
Natural Gas Combustion	0.01	0.02	0.02	0.00	0.31	0.02	0.26	0.00	0.00
Fugitive Emissions (Paved roads)	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	10.70	10.71	14.13	0.00	0.31	51.01	0.26	6.14	5.61 (Toluene)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit, since the storage vessels at this facility have a capacity of less than 75 cubic meters (19,813 gallons). Therefore, the requirements of 40 CFR 60, Subpart Kb do not apply.
- (b) The requirements of the New Source Performance Standard for Equipment Leaks in Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 60, Subpart VVa (326 IAC 12), are not included in the permit, since the process at this facility is not a synthetic organic chemicals manufacturing industry because it does not produce the chemicals listed in the rule. Therefore, the requirements of 40 CFR 60, Subpart VVa do not apply.
- (c) The requirements of the New Source Performance Standard for VOC Emission from Polymer Manufacturing Industry, 40 CFR 60, Subpart DDD (326 IAC 12), are not included in the permit, since the manufacturing process does not produce nor use polymers. Therefore, the requirements of 40 CFR 60, Subpart DDD do not apply.
- (d) The requirements of the New Source Performance Standard for VOC Emissions from the Synthetic Organic Chemicals Manufacturing Industry - Distillate Process, 40 CFR 60, Subpart NNN (326 IAC 12), are not included in the permit, since the process at this facility is not a synthetic organic chemicals manufacturing industry because it does not produce the chemicals listed in the rule. Therefore, the requirements of 40 CFR 60, Subpart NNN do not apply.
- (e) The requirements of the New Source Performance Standard for VOC Emissions from the Synthetic Organic Chemicals Manufacturing Industry - Reactor Process, 40 CFR 60, Subpart RRR (326 IAC 12), are not included in the permit, since the process at this facility is not a synthetic organic chemicals manufacturing industry because it does not produce the chemicals listed in the rule. Therefore, the requirements of 40 CFR 60, Subpart RRR do not apply.
- (f) There are no other 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)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20), are not included in the permit, since the solvents used at this source are not halogenated solvents as defined in the rule. Therefore, the requirements of 40 CFR 63 Subpart T do not apply.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20), are not included in the permit, because this source is not a major source for HAPs. Therefore, the requirements of 40 CFR 63 Subpart MMMM do not apply.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Plastic Parts, 40 CFR 63, Subpart PPPP (326 IAC 20), are not included in the permit, because this source is not a major source for HAPs. Therefore, the requirements of 40 CFR 63 Subpart PPPP do not apply.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating at Area Sources, 40 CFR 63, Subpart HHHHHH (326 IAC 20), are not included in the permit, because this source does not perform

paint stripping or autobody refinishing, and the spray application does not use materials containing chromium, lead, manganese, nickel, or cadmium. Therefore, the requirements of 40 CFR 63 Subpart HHHHHH do not apply.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chemical Manufacturing at Area Source, 40 CFR 63, Subpart VVVVVV (326 IAC 20), are not included in the permit, since the process does not use, generate, or produce any of the chemicals listed in Table 1 of the rule. Therefore, the requirements of 40 CFR 63 Subpart VVVVVV do not apply.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chemical Preparations Industry for Area Sources, 40 CFR 63, Subpart BBBB BBB (326 IAC 20), are not included in the permit, because the materials used at this source do not contain chromium, lead, manganese, and/or nickel. Therefore, the requirements of 40 CFR 63 Subpart BBBB BBB do not apply.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Paints and Allied Products Manufacturing, 40 CFR 63, Subpart CCCCCC (326 IAC 20-), are not included in the permit, because the materials used at this source do not contain benzene, methylene chloride, cadmium, chromium, lead, or nickel. Therefore, the requirements of 40 CFR 63 Subpart CCCCCC do not apply.
- (h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (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.

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 2-4.1 (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.
- (d) 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.

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

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

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

- (1) The coating manufacturing line, identified as CL1, consists of two (2) 2,500 gallon filling tanks and one (1) dry handling system that feed any combination of four (4) mixing/blending tanks individually. Therefore, each of the four mixing/blending tanks, fed by the filling tanks and the dry material system is considered one manufacturing process, and, therefore, each mixing/blending tank is subject to 326 IAC 6-3-2 because each is a manufacturing process with the potential to emit particulate matter and each has no control device. Pursuant to 326 IAC 6-3-2, the particulate emissions limitation for each mixing/blending tank shall be calculated, using the following equation:

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

Where

E = rate of emission in pounds per hour; and
P = Process weight rate in tons per hour.

For the CL1 line, each of the four (4) mixing/blending tanks, fed by the filling tanks and dry material system, has a total process weight rate is 354 lb/hr, or 0.177 tons per hour. Applying the equation, the rate of emissions for this process is 1.29 pounds per hour. As shown in Appendix A of this document, the process has an uncontrolled potential to emit particulate of 2.54 tons per year, or 0.58 pounds per hour. With potential emissions of 0.58 pounds per hour and a limited emissions rate of 1.29 pounds per hour, the source will be able to comply with this limit without the use of add-on controls.

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the four (4) mixing/blending tanks of the coating manufacturing line, identified as CL1, shall not exceed 1.29 lb/hr.

- (2) The automated coating line, identified as PL1 and the two (2) coating booths, identified as B1 and B2 are subject to the requirements of 326 IAC 6-3-2(d) because they are surface coating operations and have dry filter control devices. Pursuant to 326 IAC 6-3-2(d), the following provisions shall apply to PL1, B1, and B2:

- (A) Particulate from the one (1) automated coating paint line, identified as PL1 and the two (2) coating paint booths, identified as B1 and B2, shall each be controlled by a dry particulate filter, and the source 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

source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (i) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (ii) 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 must be maintained for five (5) years.
- (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 the potential fugitive dust emissions are less than 25 tons per year.
- (i) 326 IAC 8-1-6 (VOC New Facilities: General Reduction Requirements)
- (1) The automated coating line, PL1 is not subject to 326 IAC 8-1-6 because it is subject to 326 IAC 8-2-9 (see below).
 - (2) The two (2) coating booths, identified as B1 and B2, are not subject to the requirements of 326 IAC 8-1-6 because the uncontrolled potential to emit VOC from these two lines is less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
 - (3) The coatings manufacturing line, identified as CL1, is not subject to the requirements of 326 IAC 8-1-6 because the uncontrolled potential to emit VOC from the line is less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (j) 326 IAC 8-2-9 (Surface Coating Emissions Limitations)
- (1) The automated coating line, identified as PL1, is subject to the requirements of 326 IAC 8-2-9 because the line applies surface coating to a metal substrate and has potential VOC emissions of greater than 15 pound per day.

Pursuant to 326 IAC 8-2-9, the source shall not discharge into the atmosphere VOC in excess of 3.5 pounds VOC per gallon of coatings, less water, as delivered to the applicator. As shown in Appendix A of this document, the potential VOC emissions of the paint line PL1 is 2.80 pounds VOC per gallon of coating, less water. Therefore, the source will be able to comply with this limit without the use of add-on controls.
 - (2) The automated coating line, identified as PL1, identified as PL1, is not subject to the requirements of 326 IAC 8-2-9(f) because solvents are used do not contain VOC's. The solvent used is acetone and does not contain VOC's. Therefore, the requirements of 326 IAC 8-2-9(f) do not apply.
 - (3) The Coating Booths B1 and B2 are not subject to the requirements of 326 IAC 8-2-9 because this operation coats only plastic substrate and wood substrate and does not apply surface coating to any metal substrate. Therefore, the requirements of 326 IAC 8-2-9 do not apply.

- (4) The coatings manufacturing line, identified as CL1, is not subject to the requirements of 326 IAC 8-2-9 because this line does not engage in surface application, but, rather, manufactures coatings. Therefore, the requirements of 326 IAC 8-2-9 do not apply.
- (k) 326 IAC 8-1-12 (VOC Emission Limitations for Surface Coating of Wood Furniture and Wood Cabinets)
The paint booth B1 and B2 are not subject to the requirements of 326 IAC 8-2-12 when surface coating wood substrate because it does not apply coatings to wood furniture or cabinets, as described in the rule. Therefore, the requirements of 326 IAC 8-2-12 do not apply.
- (l) 326 IAC 8-14 (Architectural and Industrial Maintenance (AIM) Coatings)
The coating manufacturing line, CL1, is not subject to the requirements of 326 IAC 8-14 because its coatings have an end use on metal parts manufactured. The coatings manufactured on CL1 are not used for applying coating to stationary structures or appurtenances at the site of building installation, nor portable buildings, nor pavements, nor curbs. Therefore, the requirements of 326 IAC 8-14 do not apply.
- (m) 326 IAC 15 (Standards for Consumer and Commercial Products)
The coating manufacturing line, CL1, is not subject to the requirements of 326 IAC 8-15 because, pursuant to 326 IAC 8-15-2(37)(B)(i), paint products is specifically excluded from the definition of consumer products. Therefore, the requirements of 326 IAC 8-15 do not apply.

Compliance Determination, Monitoring and Testing Requirements

- (a) The automated coating line PL1 is subject to the requirements of 326 IAC 8-2-9, which limits the VOC content to 3.5 lbs VOC per gallon of coating less water. In order to show that the source is in compliance with this limit, compliance determination requirements are applicable.
- The compliance determination and monitoring requirements applicable to this source for the coating manufacturing line PL1 shall be determined using formulation data supplied by the coating manufacturer. However, IDEM OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Recordkeeping requirements shall include the following records in accordance with (1) through (2) below. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emissions limits established for the PL1 line. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a monthly basis.
- (A) Records shall include purchase orders, invoices, and materials safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added coatings and those used as cleanup solvents.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 30, 2010.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and New Source Review and MSOP No. 087-29743-00075. The staff recommends to the Commissioner that this New Source Construction and New Source Review and MSOP be approved.

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) 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.in.gov/idem

Appendix A: Emissions Calculations

Emissions Summary

Company Name: LaGrange Coatings Company
Address City IN Zip: 1439 Industrial Drive North, LaGrange, Indiana 46761
Permit No.: 087-29743-00075
Permit Writer: Jack Harmon

Process	tons/year									HAP Name
	PM	PM ₁₀	PM _{2.5}	VOC	NOx	CO	SO ₂	HAPs		
Coatings Manufacturing Line CL1	2.54	2.54	2.54	19.08	0.00	0.00	0.00	0.527		Xylene
Automated Metal Coating Line PL1	5.26	5.26	5.26	10.09	0.00	0.00	0.00	0.00		
Plastic Coating Booths B1 & B2	2.89	2.89	2.89	21.82	0.00	0.00	0.00	5.61		Toluene
Natural Gas Combustion	5.909E-03	2.363E-02	2.000E-02	1.710E-02	3.110E-01	2.612E-01	1.866E-03	5.598E-03		Hexane
Traffic emissions	8.80E-03	1.71E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00		
Total Uncontrolled Emissions	10.70	10.71	14.13	51.01	0.31	0.26	0.00	6.14		
Individual HAP Emissions										
Xylene	Toluene	Formaldehyde	Benzene	Methanol	MIBK	Ethyl Benzene	Total			
0.527	5.606	0.000	0.000	0.000	0.000	0.000	6.139			
"Worst Case" Individual HAP is Toluene										

Appendix A: Emissions Calculations

VOC/HAP and Particulate

Surface Coating Operations

Automated Metal Coating Line (PL1)

Company Name: LaGrange Coatings Company
Address City IN Zip: 1439 Industrial Drive North, LaGrange, Indiana 46761
Permit No.: 087-29743-00075
Permit Writer: Jack Harmon

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water/Exempt	Weight % Organics	Volume % Water	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Material Usage (gal/hr)	Material Usage (lb/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
WR Gray Shop Primer 72-52	9.51	75.00%	63.00%	12.00%	59.20%	25.00%	0.0204	99.000	2.80	1.14	2.02	19.21	2.30	55.31	10.09	5.26	4.56	75%
Potential Emission Rates - Coating Room																		
AND																		
Acetone and Water for Cleanup	6.69	100.00%	0.00%	0.00%	0.00%	0.00%	0.0005	99.000	0.00	0.00	0.05	0.33	0.00	0.00	0.00	0.00	0.00	100%
Total Potential Emission Rates for Cleanup Solvents																		
This facility uses one coating and one solvent.																		
Potential Emission Rates - Coating Room																		
Cleanup Solvents													2.30	55.31	10.09	5.26		
Cleanup Solvents													0.00	0.00	0.00	0.00		
Coating + Cleanup Solvent = Potential to Emit																		
													2.30	55.31	10.09	5.26		
Particulate Matter Emission Rates (lb/hr)																		
															Precontrol PM/PM10		1.20	lb/hr
															Postcontrol PM/PM10		0.25	lb/hr
*Application and Manual Cleaning - Mutually Exclusive Coating Application																		
METHODOLOGY																		

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

HAZARDOUS AIR POLLUTANTS

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
				Ethyl Benzene	Formaldehyde	MIBK	Methanol	Toluene	Xylene							
WR Gray Shop Primer 72-52	9.51	0.0204	99.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Potential Emission Rates - Coating Room																
Acetone and Water for Cleanup	6.69	0.0005	99.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating + Cleanup Solvent = Potential to Emit																
										0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating + Cleanup Solvent = Potential to Emit																
										0.00	0.00	0.00	0.00	0.00	0.00	0.00
HAP Emission Rates																
										0.00	0.00	0.00	0.00	0.00	0.00	0.00

METHODOLOGY

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

Appendix A: Emissions Calculations

Coatings Manufacturing Line (CL1)

Company Name: LaGrange Coatings Company
Address City IN Zip: 1439 Industrial Drive North, LaGrange, IN 46761
Permit No.: 087-29743-00075
Permit Writer: Jack Harmon

Paint Filling

Facility Group	EF (lb/ton)	Capacity (lbs of coating per/hr)	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)
Two (2) 2,500 Gallon Filling Tanks	30	255	34.40%	1.32	5.8
				Total:	5.763

Paint Production (Two Worst Case Coatings)

Facility Group	EF (lb/ton)	Capacity (lbs of coating per/hr)	% Solvent Content	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)
LC-5101 Undercoating						
Four (4) mixing/blending Tanks, Two (2) High Speed Mixers	0.034	354	16.74	16.74%	2.0	8.8
LC-4221 Black Enamel						
Four (4) mixing/blending Tanks, Two (2) High Speed Mixers	0.034	354	36.2	36.20%	4.4	19.1

HAPs

Facility Group	Max. Weight % Xylene	Max. Weight % Toluene	Max. Weight % Total HAPs	EF (lb/ton)	PTE Xylene (tons/yr)	PTE Toluene (tons/yr)	PTE HAP (tons/yr)
Two (2) Filling Tanks, Four (4) Mixing/blending Tanks, Two (2) High Speed Mixers	2.0%	0.0%	2.0%	0.034	0.53	0.00	0.5272
LC-4221 Black Enamel							
Two (2) Filling Tanks, Four (4) Mixing/blending Tanks, Two (2) High Speed Mixers	1.0%	0.0%	1.0%	0.034	0.26	0.00	0.2636

*Each coating is mutually exclusive

Worst Case VOC Totals

Facility Group	EF (lb/ton)	Capacity (lbs of coating per/hr)	% Solvent content	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)
Four (4) mixing/blending Tanks, Two (2) High Speed Mixers	0.034	354	36.2	36.20%	4.4	19.1
				Total:	19.084	

Worst Case HAP Totals

Facility Group	Max. Weight % Xylene	Max. Weight % Toluene	Max. Weight % Total HAPs	EF (lb/ton)	PTE Xylene (tons/yr)	PTE Toluene (tons/yr)	PTE HAP (tons/yr)
Two (2) Filling Tanks, Four (4) Mixing/blending Tanks, Two (2) High Speed Mixers	2.0%	0.0%	2.0%	0.034	0.53	0.00	0.5272
				Total:	0.527		

PM and PM-10

Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % Solids	PTE (lbs/hr)	PTE (tons/yr)
Two (2) Filling Tanks, Four (4) Mixing/blending Tanks, Two (2) High Speed Mixers	20	141.6	40.60%	0.57	2.5
				Total:	2.5

Emission Factors from AP-42, Chapter 6.4, Table 6.4-1, Methods for Estimating Air Emissions from Chemical Manufacturing, Volume II: Chapter 16, and Fire 6.2

Dry Material Handling

Capacity (lbs/yr)	PM Emission Factor (lbs PM/ton material)	PM Emissions (lbs/hr)	PM Emissions (tons/yr)
1240416	5.5	0.389	1.71

VOC

Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)
Laboratory	30	0.936	100.00%	0.014	0.061

PM and PM-10

Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % Solids	PTE (lbs/hr)	PTE (tons/yr)
Laboratory	20	0.936	47.60%	0.004	0.020

Emission Factors from AP-42, Chapter 6.4, Table 6.4-1 and Fire 6.2

Methodology

Potential to Emit VOC = Emission Factor x Capacity lbs/hr / 2000 lb/ton x Maximum weight % of VOC
 Potential to Emit PM = Emission Factor x Capacity lbs/hr / 2000 lb/ton x Maximum weight % of Solids

Appendix A: Emission Calculations

Fugitive Dust Emissions - Paved Roads

Company Name: LaGrange Coatings Company
Address City IN Zip: 1439 Industrial Drive North, LaGrange, Indiana 46761
Permit No.: 087-29743-00075
Permit Writer: Jack Harmon

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering Plant) (one way trip)	1.0	4.0	4.0	10.0	50.0	100.0	0.019	0.1	27.7
Vehicle (leaving plant) (on way trip)	1.0	4.0	4.0	10.0	50.0	100.0	0.019	0.1	27.7
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
Total			8.0		100.0			0.2	55.3

Average Vehicle Weight Per Trip = 12.5 tons/trip
 Average Miles Per Trip = 0.02 miles/trip

Unmitigated Emission Factor, Ef = $k * (sL/2)^{0.65} * (W/3)^{1.5} * C$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	12.5	12.5	10.0	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00047	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m ² = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
 where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.32	0.06	0.01	lb/mile
Mitigated Emission Factor, Eext =	0.29	0.06	0.01	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.01	1.71E-03	1.72E-04	0.01	1.56E-03	1.57E-04	0.00	7.81E-04	7.85E-05

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]



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: Mike T Reed
LaGrange Coatings Company
1439 Industrial Dr N
LaGrange, IN 46761

DATE: March 25, 2011

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

SUBJECT: Final Decision
MSOP
087-29743-00075

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

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March 25, 2011

TO: LaGrange 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: LaGrange Coating Company
Permit Number: 087-29743-00075

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 3/25/2011 LaGrange Coatings Company 087-29743-00075 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Mike T Reed LaGrange Coatings Company 1439 Industrial Dr N LaGrange IN 46761 (Source CAATS)										
2		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
3		LaGrange Co Public Library 203 W Spring St Lagrange IN 46761-1899 (Library)										
4		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)										
5		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
6		LaGrange Town Council 1201 N Townline Road LaGrange IN 46761 (Local Official)										
7		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)										
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
9												
10												
11												
12												
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