



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: January 13, 2011
RE: Imagineering Enterprises, Inc / 141-29765-00574
FROM: Matthew Stuckey, Deputy 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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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

New Source Construction and Part 70 Operating Permit OFFICE OF AIR QUALITY

Imagineering Enterprises, Inc.
3722 Foundation Court
South Bend, Indiana 46628

(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.

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

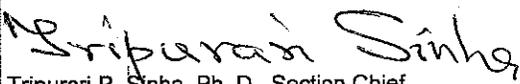
Operation Permit No.: 141-29765-00574	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: January 13, 2011 Expiration Date: January 13, 2016

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Certification
Emergency Occurrence Report
Affadavit of Construction

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary metal fabrication facility and surface coating operation.

Source Address:	3722 Foundation Court, South Bend, Indiana 46628
General Source Phone Number:	475-287-2941
SIC Code:	3479
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Nonattainment for all criteria pollutants Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) Passivation Operation, identified as PS-1, approved for construction in 2010, consisting of four (4) tanks, with a maximum volume of 400 gallons.
- (b) One (1) Etching Operation, identified as ET-1, approved for construction in 2010, consisting of three (3) tanks, with a maximum volume of 300 gallons.
- (c) One (1) CARC coating line, approved for construction in 2010, with particulate emissions controlled by dry filters, consisting of the following units:
 - (1) Four (4) spray booths, identified as (EU-01 through EU-04), with a maximum capacity of 50 units per hour each, exhausting to stacks EU-01 through EU-04, respectively; and
 - (2) One (1) touch-up spray booth, identified as EU-05, with a maximum capacity of 10 units per hour, exhausting to stack EU-05.
- (d) One (1) abrasive blasting operation, identified as AB-1, approved for construction in 2010, with a maximum capacity of 500 pounds of blasting material (aluminum oxide) per hour, with emissions controlled by a cyclone, exhausting through stack AB-1.
- (e) One (1) powder coating operation, identified as PP-1, approved for construction in 2010, with a maximum capacity of 5.75 pounds of powder per hour, with emissions controlled by a baghouse, exhausting through stack PP-1.
- (f) Three (3) natural gas-fired cure ovens, identified as CO-1 through CO-3, approved for construction in 2010, with maximum heat input capacities of 3.50 MMBtu/hr, 3.50 MMBtu/hr, and 0.40 MMBtu/hr, respectively, with emissions exhausting through stacks CO-1 through CO-3, respectively.
- (g) One (1) natural gas-fired boiler, identified as B-1, approved for construction in 2010, used for process heat, with a maximum heat input capacity of 3.65 MMBtu/hr, with emissions exhausting through stack B-1.
- (h) Seven (7) natural gas-fired space heaters, identified as B-2 and B-4 through B-9, approved for construction in 2010, with maximum heat input capacities of 0.22 MMBtu/hr, 0.20 MMBtu/hr, 0.32 MMBtu/hr, 0.20 MMBtu/hr, 0.20 MMBtu/hr, 2.00 MMBtu/hr, and 0.20 MMBtu/hr, respectively, with emissions exhausting through stacks B-2 and B-4 through B-9, respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 325 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) The Part 70 Operating Permit, T141-29765-00574, 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, including any permit shield provided in 326 IAC 2-7-15, 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 [326 IAC 2-7-7] [IC 13-17-12]

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 [326 IAC 2-7-5(5)]

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 [326 IAC 2-7-5(6)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
 - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.13 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.14 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to 141-29765-00574 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.23 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 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.3 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.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-6(1)]

C.6 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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.7 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.10 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.11 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.12 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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 [326 IAC 2-7-5][326 IAC 2-7-6]

- (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.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Passivation Operation, identified as PS-1, approved for construction in 2010, consisting of four (4) tanks, with a maximum volume of 400 gallons.
- (b) One (1) Etching Operation, identified as ET-1, approved for construction in 2010, consisting of three (3) tanks, with a maximum volume of 300 of gallons.
- (c) One (1) powder coating operation, identified as PP-1, approved for construction in 2010, with a maximum capacity of 5.75 pounds of powder per hour, with emissions controlled by a baghouse, exhausting through stack PP-1.
- (d) Seven (7) natural gas-fired space heaters, identified as B-2 and B-4 through B-9, approved for construction in 2010, with maximum heat input capacities of 0.22 MMBtu/hr, 0.20 MMBtu/hr, 0.32 MMBtu/hr, 0.20 MMBtu/hr, 0.20 MMBtu/hr, 2.00 MMBtu/hr, and 0.20 MMBtu/hr, respectively, with emissions exhausting through stacks B-2 and B-4 through B-9, respectively.

(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 2-7-5(1)]

D.1.1 Particulate Emission Limitations, Except Lake County [326 IAC 6.5-1-2]

- (a) The particulate matter emissions from the passivation operation (PS-1) shall not exceed 0.03 g/dscf.
- (b) The particulate matter emissions from the etching operation (ET-1) shall not exceed 0.03 g/dscf.
- (c) The particulate matter emissions from the powder coating operation (PP-1) shall not exceed 0.03 g/dscf.
- (c) The particulate matter emissions from each space heater (B-2, B-4 through B-9) shall not exceed 0.03 g/dscf.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) CARC coating line, approved for construction in 2010, with particulate emissions controlled by dry filters, consisting of the following units:
- (1) Four (4) spray booths, identified as (EU-01 through EU-04), with a maximum capacity of 50 units per hour each, exhausting to stacks EU-01 through EU-04, respectively; and
 - (2) One (1) touch-up spray booth, identified as EU-05, with a maximum capacity of 10 units per hour, exhausting to stack EU-05.
- (b) Three (3) natural gas-fired cure ovens, identified as CO-1 through CO-3, approved for construction in 2010, with maximum heat input capacities of 3.50 MMBtu/hr, 3.50 MMBtu/hr, and 0.40 MMBtu/hr, respectively, with emissions exhausting through stacks CO-1 through CO-3, respectively.

(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 2-7-5(1)]

D.2.1 Particulate Emission Limitations, Except Lake County [326 IAC 6.5-1-2]

- (a) The particulate matter emissions from each surface coating stack (EU-01 through EU-05) shall not exceed 0.03 g/dscf.
- (b) The particulate matter emissions from each cure oven (CO-1 through CO-3) shall not exceed 0.03 g/dscf.

D.2.2 Miscellaneous Metals Coating [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating units shall be limited to 4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings pounds of VOC per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, is required for the surface coating units and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.4 Control Requirements [326 IAC 2-7-6(6)]

In order to comply with Condition D.2.1, dry filters must be in operation and controlling emissions at all times any of the surface coating units are in operation.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)] [326 IAC 2-2]

Compliance with the VOC content limitation contained in Conditions D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.2.6 Monitoring [326 IAC 2-7-5(1)]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (EU-1 through EU-5) while one or more of the booths are in operation. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to response steps.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, when or evidence of overspray emission is observed, the Permittee shall take reasonable response steps. Failure to take response shall be considered a deviation from this permit. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to response steps

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirement

- (a) To document the compliance status with Condition D.2.6, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (b) To document the compliance status with Condition D.2.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition 2.3. Records necessary to demonstrate compliance shall be available within thirty (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 material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to record keeping

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) abrasive blasting operation, identified as AB-1, approved for construction in 2010, with a maximum capacity of 500 pounds of blasting material (aluminum oxide) per hour, with emissions controlled by a cyclone, exhausting through stack AB-1.

(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 2-7-5(1)]

D.3.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable to the entire source, the Permittee shall comply with the following limits:

- (a) PM emissions from the Abrasive Blasting operation (AB-1) shall not exceed 9.72 lb/hr.
- (b) PM10 emissions from the Abrasive Blasting operation (AB-1) shall not exceed 9.72 lb/hr.

Compliance with these limits, combined with potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM and PM10 to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.3.2 Particulate Emission Limitations, Except Lake County [326 IAC 6.5-1-2]

The particulate matter emissions from the abrasive blasting operation shall not exceed 0.03 g/dscf.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, is required for the abrasive blasting operation and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.3.4 Control Requirements [326 IAC 2-7-6(6)]

In order to comply with Condition D.3.1 and Condition D.3.2, the cyclone must be in operation and controlling emissions at all times the abrasive blasting units are in operation.

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate the compliance status with Condition D.3.1, within 180 days of start-up of the blasting operation, the Permittee shall perform PM testing on the cyclone using methods as approved by the Commissioner. These tests shall be repeated at least five (5) years from the date of this valid compliance demonstration. Section C- Performance Testing contains the Permittee's obligation with regard to performance testing.
- (b) In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM10 testing for the cyclone within 180 days of publication of the new or revised condensable PM10 and PM2.5 test method(s) referenced in the U. S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM2.5), signed on May 8th, 2008 or within 180 days of issuance of this permit, whichever is later. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regard to performance testing. PM10 includes filterable and condensable PM10.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.3.6 Visible Emissions Notations

- (a) Daily visible emission notations of the abrasive blasting stack exhaust (AB-1) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to response to excursions and exceedances.

D.3.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the units. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirement

- (a) To document the compliance status with Condition D.3.6, the Permittee shall maintain daily records of the visible emission notations of the abrasive blasting stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition

SECTION D.4

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) natural gas-fired boiler, identified as B-1, approved for construction in 2010, used for process heat, with a maximum heat input capacity of 3.65 MMBtu/hr, with emissions exhausting through stack B-1.

(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 2-7-5(1)]

D.4.1 Particulate Emission Limitations, Except Lake County [326 IAC 6.5-1-2]

The particulate matter emissions from the boiler stack (B-1) shall not exceed 0.01 g/dscf.

SECTION D.5

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 325 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(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 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations after January 1, 1980, performing organic solvent degreasing operation located anywhere in the state, the owner or operator shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirements; and
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph counties shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph counties shall ensure that the following control equipment requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Imagineering Enterprises, Inc.
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-29765-00574

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Imagineering Enterprises, Inc.
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-29765-00574

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Imagineering Enterprises, Inc.
 Source Address: 3722 Foundation Court, South Bend, Indiana 46628
 Part 70 Permit No.: 141-29765-00574

Months: _____ to _____ Year: _____

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

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Imagineering Enterprises, Inc.
3722 Foundation Court
South Bend, Indiana 46628

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 Imagineering Enterprises, Inc. 3722 Foundation Court, South Bend, Indiana 46628, completed construction of the metal fabrication facility and surface coating operation on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 7, 2010, and as permitted pursuant to New Source Construction Permit and Part 70 Operating Permit No. 141-29765-00574, Plant ID No. 41--00574 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 _____)

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 Part 70 Operating Permit

Source Background and Description
--

Source Name:	Imagineering Enterprises, Inc.
Source Location:	3722 Foundation Court, South Bend, IN 46628
County:	St. Joseph
SIC Code:	3479
Part 70 Operating Permit No.:	T141-29765-00574
Permit Reviewer:	Jillian Bertram

On November 22, 2010, the Office of Air Quality (OAQ) had a notice published in South Bend Tribune, South Bend, Indiana, stating that Imagineering Enterprises, Inc. had applied for a new source construction and Part 70 Permit to construct and operate a new metal fabrication facility and surface coating operation. The notice also stated that the OAQ proposed to issue a New Source Construction and Part 70 Permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On December 8, 2010, Sam Portonova, representing U.S. EPA Region 5, submitted comments to IDEM, OAQ on the draft New Source Construction and Part 70 Permit.

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

Comment 1:

The calculations on pg. 9 of TSD Appendix A say that limited PTE for PM emissions from abrasive blasting is 67.58 tpy. However, the TSD and permit conditions say that emissions are limited to 42.57 tpy (9.72 lb/hr). What accounts for the discrepancy? How is the 25 tpy less emissions achieved in practice if emissions after controls were calculated to be 67.58 tpy?

Response to Comment 1:

42.57 tons per year is equivalent to the limit established for particulate from the abrasive blasting operation under 326 IAC 6.5, 0.03 g/dscf, since the baghouse has a flow rate of 37,800 dscf/min (See ATSD App A). 67.58 tons per year was based on a limit, from 326 IAC 6-3-2, that was erroneously applied in previous drafts. This reference to the limit was missed when updating permit documents. The control efficiency for the blasting baghouse in the calculations was the control efficiency required to meet the limit that was improperly applied, a limit from 326 IAC 6-3-2, not the maximum control efficiency of the baghouse. This portion of the calculations has been removed because there are no control efficiency requirements in the permit.

The allowable emissions table in the blasting calculations has been updated to reflect the

applicability of 326 IAC 6.5 and not 326 IAC 6-3-2.

The permit does not require any revisions due to this comment.

Comments 2 and 3:

The calculations on pg 7 of TSD Appendix A say that PM potential emissions from the CARC surface coating will be 9.03 tpy after controls. However, the TSD lists PM emissions from the CARC Coating Line at 39.42 tpy. What accounts for the higher emissions in the TSD?

Permit condition D.2.1 limits PM emissions from the coating stacks and the cure ovens to 0.03 gr/dscf and it is cited as a PSD minor limit. How does this limit correlate to either the 39.43 tpy limit (in the TSD) or the 9.03 tpy potential emissions from the calculations.

Response to Comments 2 and 3:

IDEM agrees with the recommended changes, since there are inconsistencies between the calculations for the surface coating unit and the limited potential to emit table in the TSD and more clarification is necessary.

Emissions of 39.42 tons per year listed in the limited table of the TSD are equivalent to the limit for the coating line under 326 IAC 6.5, 0.03g/dscf since the stacks (EU-01 through EU-5) have a combined flow rate of 35,000 dscf/min (See ATSD App A). Since g/dscf limits are based on a flow rate and there is no permit condition requiring a set flow rate, tons/yr emissions from the line are not directly limited. Therefore, emissions in the limited table are the uncontrolled emissions from the coating line.

The permit does not require any revisions due to these comments.

IDEM Contact

- (a) Questions regarding this proposed New Source Construction and Part 70 Permit can be directed to Jillian Bertram 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)233-1782 or toll free at 1-800-451-6027 extension 3-1782.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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

Appendix A – Emission Calculations
Addendum to the Technical Support Document (ATSD)
New Source Construction and Part 70 Operating Permit

Source Description and Location

Company Name: Imagineering Enterprises, Inc.
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
County: St. Joseph
SIC / NAICS Code: 3479 332812
Permit Number: T141-29765-00574
Permit Reviewer: Kimberly Cottrell/ Jillian Bertram
Date: December 9, 2010 KLC

Summary of Potential to Emit

The tables below summarize the potential to emit calculations submitted by Imagineering Enterprises. The subsequent pages of this document contain the calculations provided by Imagineering Enterprises. IDEM has reviewed these

Uncontrolled Potential To Emit (ton/yr)								
Process / Emission Unit	CO	NO_x	PM	PM₁₀	SO₂	VOC	HAP Cobalt	Total HAPs
Passivation and Etching Tanks	0	5.73	1.84	1.84	0	1.79	0	0.00
CARC Coating Line	0	0	180.59	180.59	0	221.38	1.68	1.80
Blasting	0	0	135.15	135.15	0	0	N/A	0
Powder Coating	0	0	0.0375	0.0375	0	0	N/A	0
Cure Ovens	2.59	3.09	0.06	0.23	0.02	0.17	N/A	0.06
Boiler B-1	1.28	1.52	0.03	0.12	0.01	0.08	N/A	0.03
Space Heaters	1.17	1.39	0.03	0.11	0.01	0.08	N/A	0.03
Totals:	5.04	11.73	317.73	318.08	0.04	223.50	1.68	1.92

Limited Potential To Emit (ton/yr)								
Process / Emission Unit	CO	NO_x	PM	PM₁₀	SO₂	VOC	HAP Cobalt	Total HAPs
Passivation and Etching Tanks	0	5.73	1.84	1.84	0	1.79	0	0
CARC Coating Line	0	0	180.59	180.59	0	221.38	1.68	1.80
Blasting	0	0	42.57	42.57	0	0	N/A	0
Powder Coating	0	0	0.0375	0.0375	0	0	N/A	0
Cure Ovens	2.59	3.09	0.06	0.23	0.02	0.17	N/A	0.06
Boiler B-1	1.28	1.52	0.03	0.12	0.01	0.08	N/A	0.03
Space Heaters	1.17	1.39	0.03	0.11	0.01	0.08	N/A	0.03
Totals:	5.04	11.73	225.15	225.49	0.04	223.50	1.68	1.92

SURFACE COATING

PM AND VOC EMISSIONS

UNRESTRICTED POTENTIAL TO EMIT

OPERATIONAL MATERIALS	Density (lb/gal)	Weight % Solids	Weight % VOCs	Volume % Solids	Volume % VOCs	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	lb VOC/gal coating (less water and non-VOCs)	PTE VOC (tons/yr)	PTE PM/PM10 (tons/yr)	PTE PM/PM10 After Control (tons/yr)	lb VOC per gal solids	Transfer Efficiency	Overspray Control Efficiency
CARC PAINT	9.6	48.77%	9.22%	40.20%	11.86%	0.10	100	240	95.70	1.69	38.6	51.11	2.555	2.2	75%	95%
PRIMER	10.5	43.47%	15.63%	30.60%	21.00%	0.25	100	600	261.25	3.17	178.9	124.35	6.218	5.3	75%	95%
CARC PAINT FOR TOUCH UP	9.6	48.77%	9.23%	40.20%	11.86%	0.10	10	24	9.60	1.70	3.9	5.13	0.256	2.2	75%	95%
TOTAL ==											221.38	180.59	9.03			
CLEANING SOLVENTS																
OX SOL-100	11.17	0%	0%	0%	0%	0.001	100	2.40	1.12	0	0	0	0	NA	100%	NA
Totals											221.38	180.59	9.03			

METHODOLOGY

*All materials *as applied*.

**Actual Emissions based on 8 hours per day

Maximum Usage (gal/day) = [Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]

Maximum Usage (lbs/hr) = [Maximum Usage (gal/day)] * [Density (lb/gal)] / [24 hour/day]

PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]

PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]

PTE of PM/PM10 (tons/yr) = [Density (lbs/gal)] * [Maximum Usage (gal/day)] * [(Weight % Solids)] * [1 - Transfer efficiency]] * [365 days/yr] * [1 ton/2000 lbs]

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

Actual Emissions of VOCs (lbs/day) = [Uncontrolled PTE of VOCs (lbs/hour)] * [Actual Hours of Operation (hours/day)]

Total = Worst Case Coatings + Sum of all solvents used

ABRASIVE BLASTING, POWDER PAINTING, DUST COLLECTORS

PM EMISSIONS

Potential to Emit (PTE) PM and PM10

BAGHOUSE ID	Baghouse Outlet Grain Loading (grains/acf)	Baghouse Outlet Air Flow Rate (acfm)	PTE of PM/PM10 BEFORE Controls (lbs/hr)	PTE of PM/PM10 BEFORE Controls (tons/yr)	Control Efficiency (%)	PTE of PM/PM10 After Controls (lbs/hr)	PTE of PM/PM10 After Controls (tons/yr)
AB-1	0.003	1,200	30.86	135.15	99.9%	0.03	0.14
PP-1	0.0001	1,000	0.01	0.0375	90.0%	0.00086	0.0038
Total			30.87	135.19		0.03	0.14

326 IAC 6.5 Allowable PM Emission Rate

Baghouse ID	Limit (g/dscf)	Flow Rate (dscf/min)	326 IAC 6.5 Allowable PM Emission Rate (lbs/hr)	326 IAC 6.5 Allowable PM Emission Rate (tons/yr)
AB-1	0.03	37800.00	9.72	42.57
PP-1	None			

METHODOLOGY

Potential to Emit PM/PM10 After Controls (lbs/hr) = [Baghouse Outlet Grain Loading (grains/acf)] * [Baghouse Outlet Air Flow Rate (acfm)] * [60 min/hr] * [lbs/7000 grains]

Potential to Emit PM/PM10 After Controls (tons/yr) = [Potential to Emit PM/PM10 After Controls (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]

* Limited Control Efficiencies are the calculated to establish the minimum control efficiency required to comply with applicable rules, not the maximum control efficiencies of the baghouses.

Actual emissions for abrasive blasting particulate matter are to be calculated after consideration of the controls. 326IAC 2-7-1 (21)

PM = Particulate Matter, PM-10 = Particulate Matter less than 10 micrometers, PTE = Potential to Emit

326 IAC 6.5 Allowable PM Emission Rate = Limit (g/dscf) * Flow Rate (dscf/min) * 1/7000 (lb/g) * 60 (min/hr)

AB-1 uses aluminum oxide blasting media.

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

Technical Support Document (TSD) for a New Source Construction
and Part 70 Permit

Source Description and Location

Source Name: Imagineering Enterprises, Inc.
 Source Location: 3722 Foundation Court, South Bend, IN 46628
 County: St. Joseph
 SIC Code: 3479
 Part 70 Operating Permit No.: T141-29765-00574
 Permit Reviewer: Kimberly Cottrell/Jillian Bertram

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in St. Joseph County.

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

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM_{2.5}

St. Joseph 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

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

Fugitive Emissions

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

Description of Proposed New Source Construction

The Office of Air Quality (OAQ) has reviewed a new source construction application, submitted by Imagineering Enterprises, Inc. on October 7, 2010, relating to the construction and operation of a metal fabrication facility and surface coating operation. The following is a list of the proposed emission units and pollution control devices.

- (a) One (1) Passivation Operation, identified as PS-1, approved for construction in 2010, consisting of four (4) tanks, with a maximum volume of 400 gallons.
- (b) One (1) Etching Operation, identified as ET-1, approved for construction in 2010, consisting of three (3) tanks, with a maximum volume of 300 gallons.
- (c) One (1) CARC coating line, approved for construction in 2010, with particulate emissions controlled by dry filters, consisting of the following units:
 - (1) Four (4) spray booths, identified as (EU-01 through EU-04), with a maximum capacity of 50 units per hour each, exhausting to stacks EU-01 through EU-04, respectively; and
 - (2) One (1) touch-up spray booth, identified as EU-05, with a maximum capacity of 10 units per hour, exhausting to stack EU-05.
- (d) One (1) abrasive blasting operation, identified as AB-1, approved for construction in 2010, with a maximum capacity of 500 pounds of blasting material (aluminum oxide) per hour, with emissions controlled by a cyclone, exhausting through stack AB-1.
- (e) One (1) powder coating operation, identified as PP-1, approved for construction in 2010, with a maximum capacity of 5.75 pounds of powder per hour, with emissions controlled by a baghouse, exhausting through stack PP-1.
- (f) Three (3) natural gas-fired cure ovens, identified as CO-1 through CO-3, approved for construction in 2010, with maximum heat input capacities of 3.50 MMBtu/hr, 3.50 MMBtu/hr, and 0.40 MMBtu/hr, respectively, with emissions exhausting through stacks CO-1 through CO-3, respectively.
- (g) One (1) natural gas-fired boiler, identified as B-1, approved for construction in 2010, used for process heat, with a maximum heat input capacity of 3.65 MMBtu/hr, with emissions exhausting through stack B-1.

- (h) Seven (7) natural gas-fired space heaters, identified as B-2 and B-4 through B-9, approved for construction in 2010, with maximum heat input capacities of 0.22 MMBtu/hr, 0.20 MMBtu/hr, 0.32 MMBtu/hr, 0.20 MMBtu/hr, 0.20 MMBtu/hr, 2.00 MMBtu/hr, and 0.20 MMBtu/hr, respectively, with emissions exhausting through stacks B-2 and B-4 through B-9, respectively.

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

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	317.73
PM10 ⁽¹⁾	318.08
SO ₂	0.04
NO _x	11.73
VOC	223.50
CO	5.04

(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)
Cobalt	1.68
TOTAL HAPs	1.96

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM, PM10, and VOC is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source is provisions of 326 IAC 2-7 and will be issued a New Source Construction and Part 70 Operating Permit.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) 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).

PTE of the Entire Source After Issuance of the Part 70 Operating Permit

The table below summarizes the potential to emit of the entire source after issuance of this Part 70 Operating Permit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Part 70 Operating Permit (tons/year)							
	PM	PM10	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Passivation and Etching Tanks	1.84	1.81	0	5.73	1.79	0	N/A	N/A
CARC Coating Line	39.42	39.42	0	0	221.38	0	1.80	1.68
Blasting	42.57	42.57	0	0	0	0	0	N/A
Powder Coating	0.04	0.04	0	0	0	0	0	N/A
Cure Ovens	0.06	0.23	0.02	3.09	0.17	2.59	0.06	N/A
Boiler B-1	0.03	0.12	0.01	1.52	0.08	1.28	0.03	N/A
Space Heaters	0.03	0.11	0.01	1.39	0.08	1.17	0.03	N/A
Total PTE of Entire Source	83.98	84.32	0.04	11.73	223.50	5.04	1.96	1.68
PSD Major Source Thresholds	250	250	250	250	250	250	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".								

PSD Minor Source

This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of PM and PM10 is limited to less than 250 tons per year and the potential to emit all other attainment criteria 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.

In order to render the requirements of 326 IAC 2-2 not applicable to the source, the source shall comply with the following limits:

- (a) PM emissions from the Abrasive Blasting operation (AB-1) shall not exceed 9.72 lb/hr.
- (b) PM10 emissions from the Abrasive Blasting operation (AB-1) shall not exceed 9.72 lb/hr.

Compliance with these limits, combined with the potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM and PM10 to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants

(NESHAPs) for Hazardous Air Pollutants: Paint Stripping And Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in this permit. Although the source performs spray application of coatings to motor vehicles and mobile equipment and is considered an area source of Hazardous Air Pollutants as defined by 40 CFR 63.11170(b), the surface coating operations do not apply coatings that contain the target HAP (cadmium, chromium, lead, manganese, and nickel), as defined in §63.11180.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, 40 CFR 63, Subpart WWWWWW, are not included in this permit. Although the source performs electroplating other than chromium electroplating and is considered an area source of Hazardous Air Pollutants as defined by 40 CFR 63.11504(a)(2), the Non-Chrome Alodine 5200 tank does not use or have emissions of compounds of one or more plating and polishing metal HAPs (cadmium, chromium, lead, manganese, and nickel), as defined in §63.11511.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in this permit. Although the source performs metal fabrication and finishing and is considered an area source of Hazardous Air Pollutants, the source is not one of the nine source categories specified in §63.11514(a)(1) through (9) and does not contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel.
- (f) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
CARC Coating Line – PM	Dry Filters	Y	180.59	39.42	100	Y	N
CARC Coating Line – PM10	Dry Filters	Y	180.59	39.42	100	Y	N
Blasting – PM	Cyclone	Y	135.15	42.57	100	Y	N
Blasting – PM10	Cyclone	Y	135.15	42.57	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the CARC Coating Line and the Blasting Operation for PM and PM10 upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application.

State Rule Applicability Determination – Entire Source

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (PSD and Emission Offset)

Emissions of criteria pollutants from the entire source will be limited to less than 250 tons per year, rendering 326 IAC 2-2 not applicable to the source.

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

The operation of each unit at the facility will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2004, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

State Rule Applicability Determination – Individual Emission Units

Passivation Operation (PS-1)

326 IAC 6.5 (Particulate Emission Limitations for Manufacturing Sources, Except Lake County)

The source is located in St. Joseph County. However, the source is not specifically listed in 326 IAC 6.5-7. Therefore, the particulate emissions from the Passivation Operation stack shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

There is no control device required to comply with this limit.

Etching Operation (ET-1)

326 IAC 6.5 (Particulate Emission Limitations for Manufacturing Sources, Except Lake County)

The source is located in St. Joseph County. However, the source is not specifically listed in 326 IAC 6.5-7. Therefore, the particulate emissions from the Etching Operation stack shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

There is no control device required to comply with this limit.

CARC Coating Line (EU-1 through EU-5)

326 IAC 6.5 (Particulate Emission Limitations for Manufacturing Sources, Except Lake County)

The source is located in St. Joseph County. However, the source is not specifically listed in 326 IAC 6.5-7. Therefore, the particulate emissions from each surface coating stack shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

Dry filters shall be in operation and controlling emissions at all times any of the surface coating units are in operation in order to comply with this limit.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating units shall be limited to 4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings pounds of VOC per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS sheets submitted by the source, the source is able to comply with these limits.

Blasting Operation (AB-1)

326 IAC 6.5 (Particulate Emission Limitations for Manufacturing Sources, Except Lake County)

The source is located in St. Joseph County. However, the source is not specifically listed in 326 IAC 6.5-7. Therefore, the particulate emissions from the blasting stack shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

The cyclone shall be in operation and controlling emissions at all times the blasting unit is in operation in order to comply with this limit.

Powder Coating Operation (PP-1)

326 IAC 6.5 (Particulate Emission Limitations for Manufacturing Sources, Except Lake County)

The source is located in St. Joseph County. However, the source is not specifically listed in 326 IAC 6.5-7. Therefore, the particulate emissions from the Powder Coating Operation stack shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

There is no control device required to comply with this limit.

Cure Ovens

326 IAC 6.5 (Particulate Emission Limitations for Manufacturing Sources, Except Lake County)

The source is located in St. Joseph County. However, the source is not specifically listed in 326 IAC 6.5-7. Therefore, the particulate emissions from each Cure Oven stack shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

There is no control device required to comply with this limit.

Space Heating (B-2, B-4 through B-9)

326 IAC 6.5 (Particulate Emission Limitations for Manufacturing Sources, Except Lake County)

The source is located in St. Joseph County. However, the source is not specifically listed in 326 IAC 6.5-7. Therefore, the particulate emissions from each Space Heater stack shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

There is no control device required to comply with this limit.

Boiler (B-1)

326 IAC 6.5 (Particulate Emission Limitations for Manufacturing Sources, Except Lake County)

The source is located in St. Joseph County. However, the source is not specifically listed in 326 IAC 6.5-7. The boiler is a gaseous fuel combustion steam generator, therefore, the particulate emissions from the Boiler 1 stack shall not exceed 0.01 grains per dry standard cubic foot of exhaust air.

There is no control device required to comply with this limit.

Insignificant Degreasing Operations

326 IAC 8-3-2 and 326 IAC 8-3-5 (Solvent Degreasing Operations)

Since these units are cold cleaning degreasing units using a VOC-containing solvent, constructed after July 1, 1990, the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5 apply.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for

enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Compliance Determination and Monitoring Requirements applicable to this modification are as follows:

- (a) The CARC Coating Line has applicable compliance determination conditions as specified below:
 - (1) The dry filters shall be in operation and controlling emissions at all times that any of the surface coating units are in operation (326 IAC 6.5, 326 IAC 2-2).
 - (2) Daily inspections to verify placement, integrity, and particulate loading to filters (326 IAC 6.5, 326 IAC 2-2).
 - (3) Weekly observations of overspray (326 IAC 6.5, 326 IAC 2-2).
 - (4) Monthly overspray inspections (326 IAC 6.5, 326 IAC 2-2).
 - (5) As supplied and as applied VOC data sheets (326 IAC 8-2-2)
- (b) The Blasting Operation has applicable compliance determination conditions as specified below:
 - (1) The cyclone shall be in operation and controlling emissions at all times that the blasting unit is in operation (326 IAC 6.5, 326 IAC 2-2).
 - (2) Daily visible emissions notations (326 IAC 6.5, 326 IAC 2-2).
 - (3) Cyclone failure detection (326 IAC 6.5, 326 IAC 2-2).

Summary of Testing Requirements						
Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement	Underlying Rule
AB-1	Cyclone	180 days after start-up	PM/PM10	5 years	0.03 g/dscr	326 IAC 6.5, 326 IAC 2-2

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed New Source Construction and Part 70 Operating Permit No. 141-29765-00574. The staff recommend to the Commissioner that this New Source Review and Part 70 Operating Permit be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jillian Bertram 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)233-1782 or toll free at 1-800-451-6027 extension 3-1782.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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

Appendix A – Emission Calculations
Technical Support Document (TSD)
New Source Construction and Part 70 Operating Permit

Source Description and Location

Company Name: Imagineering Enterprises, Inc.
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
County: St. Joseph
SIC / NAICS Code: 3479 332812
Permit Number: T141-29765-00574
Permit Reviewer: Kimberly Cottrell/ Jillian Bertram
Date: October 18, 2010

Summary of Potential to Emit

The tables below summarize the potential to emit calculations submitted by Imagineering Enterprises. The subsequent pages of this document contain the calculations provided by Imagineering Enterprises. IDEM has reviewed these

Uncontrolled Potential To Emit (ton/yr)								
Process / Emission Unit	CO	NO_x	PM	PM₁₀	SO₂	VOC	HAP Cobalt	Total HAPs
Passivation and Etching Tanks	0	5.73	1.84	1.84	0	1.79	0	0.00
CARC Coating Line	0	0	180.59	180.59	0	221.38	1.68	1.80
Blasting	0	0	135.15	135.15	0	0	N/A	0
Powder Coating	0	0	0.0375	0.0375	0	0	N/A	0
Cure Ovens	2.59	3.09	0.06	0.23	0.02	0.17	N/A	0.06
Boiler B-1	1.28	1.52	0.03	0.12	0.01	0.08	N/A	0.03
Space Heaters	1.17	1.39	0.03	0.11	0.01	0.08	N/A	0.03
Totals:	5.04	11.73	317.73	318.08	0.04	223.50	1.68	1.92

Limited Potential To Emit (ton/yr)								
Process / Emission Unit	CO	NO_x	PM	PM₁₀	SO₂	VOC	HAP Cobalt	Total HAPs
Passivation and Etching Tanks	0	5.73	1.84	1.84	0	1.79	0	0
CARC Coating Line	0	0	39.42	39.42	0	221.38	1.68	1.80
Blasting	0	0	42.57	42.57	0	0	N/A	0
Powder Coating	0	0	0.04	0.04	0	0	N/A	0
Cure Ovens	2.59	3.09	0.06	0.23	0.02	0.17	N/A	0.06
Boiler B-1	1.28	1.52	0.03	0.12	0.01	0.08	N/A	0.03
Space Heaters	1.17	1.39	0.03	0.11	0.01	0.08	N/A	0.03
Totals:	5.04	11.73	83.98	84.32	0.04	223.50	1.68	1.92

SOURCE AIR EMISSIONS SUMMARY

ACID GASSING RATES AND EMISSIONS

COMPANY: Imagineering Finishing Technologies
ADDRESS: 3722 Foundation Court, South Bend, IN 46628
PERMIT NO.: NEW
COMPLETED BY: Chris Heaton
DATE: August 13, 2010

ELECTROPLATING POTENTIAL TO EMIT

Key: CN - Cyanide

Ni - Nickel

Cr - Chromium

HCl - Hydrochloric Acid

HNO₃ - Nitric Acid

H₂SO₄ - Sulfuric Acid

NO_x - Nitrous Oxide

PM₁₀ - Particulate Matter of Less than 10 Microns

SO₂ - Sulfur Dioxide

Conc. - concentration

HF - Hydrofluoric acid

PASSIVATION AND ETCH - MAXIMUM YEARLY THROUGHPUTS

SION UNIT/PROI	DENSITY LBS/GAL	THROUGHPUT GAL/DAY	THROUGHPUT LBS/HR	THROUGHPUT LBS/YR	AREA OF TANK
----------------	--------------------	-----------------------	----------------------	----------------------	-----------------

One (1) acid bath (P1)/ hydrofluoric acid 49	9.67	0.09	0.05	476	100
One (1) caustic bath (P2)/ Isoprep	11.90	0.92	0.68	5994	100
One (1) acid bath (P3)/ Nitric acid 85	11.30	5.97	4.22	36935	100
Two (2) solvent bath (P4)/ Isopropyl alcohol	6.55	1.00	0.41	3586	100
One (1) caustic bath (E1)/ soda ash 100	11.67	2.00	1.46	12779	100
One (1) acid bath (E2)/ sulfuric acid 25	15.30	4.80	4.59	40208	100
One (1) rust preventitive bath (E3)	9.42	35.00	20.61	180511	100

PASSIVATION AND ETCH OPERATIONS - MATERIAL USAGES AND PERCENT CONCENTRATIONS

P = PASSIVATION TANK

E = ETCH TANK

	Max throughput lbs/yr	NITRIC ACID	CO	VOC	SULFURIC ACID	HYDROFLUORIC ACID	PM/PM ₁₀ EMISSIONS FACTOR (LBS/HR-FT ²)
P1 / Hydrofluoric	476	0.00%	0.00%	0.00%	0.00%	49.00%	0.0006
P2 / Isoprep	5,994	0.00%	0.00%	0.00%	0.00%	0.00%	0.0006
P3 / Nitric acid 85	36,935	85.00%	0.00%	0.00%	0.00%	0.00%	0.0006
P4 / isoprpyol alc	3,586	0.00%	0.00%	100.00%	0.00%	0.00%	0.0006

E1 / soda ash 100	12,779	0.00%	0.00%	0.00%	0.00%	0.00%	0.0006
E2 / sulfuric acid	40,208	0.00%	0.00%	0.00%	25.00%	0.00%	0.0006
E3 / rust preventi	180,511	0.00%	0.00%	0.00%	0.00%	0.00%	0.0006

PASSIVATION AND ETCH - ESTIMATED EMISSIONS (LBS/YR)

	NO _x	CO	VOC	SO _x	PM/PM ₁₀ (TONS)	PM/PM ₁₀ (LB/HR)	HF
P1 / Hydrofluoric	0.00	0.00	0.00	0.00	525.60	0.2628	0.00
P2 / Isoprep	0.00	0.00	0.00	0.00	525.60	0.2628	0.00
P3 / Nitric acid 85	11459.05	0.00	0.00	0.00	525.60	0.2628	0.00
P4 / isoprpoyl alc	0.00	0.00	3586.13	0.00	525.60	0.2628	0.00
E1 / soda ash 100	0.00	0.00	0.00	0.00	525.60	0.2628	0.00
E2 / sulfuric acid	0.00	0.00	0.00	0.00	525.60	0.2628	0.00
E3 / rust preventi	0.00	0.00	0.00	0.00	525.60	0.2628	0.00

PASSIVATION AND ETCH - ESTIMATED EMISSIONS (TONS/YR)

	NO _x	CO	VOC	SO _x	PM/PM ₁₀ (TONS)	HF
P1 / Hydrofluoric	0.00	0.00	0.00	0.00	0.26	0.00
P2 / Isoprep	0.00	0.00	0.00	0.00	0.26	0.00
P3 / Nitric acid 85	5.73	0.00	0.00	0.00	0.26	0.00
P4 / isoprpoyl alc	0.00	0.00	1.79	0.00	0.26	0.00
E1 / soda ash 100	0.00	0.00	0.00	0.00	0.26	0.00
E2 / sulfuric acid	0.00	0.00	0.00	0.00	0.26	0.00
E3 / rust preventi	0.00	0.00	0.00	0.00	0.26	0.00
TOTALS - TPY	5.73	0.00	1.79	0.00	1.84	0.00

METHODOLOGY

*NO₂ [lb/yr] = Usage [lb/yr] x Nitric acid [%] x 0.365 [lb NO₂/lb HNO₃]

NO₂ [ton/yr] = NO₂ [lb/yr] / 2000 [lb/ton]

**SO₂ [lb/yr] = Usage [lb/yr] x Sulfuric acid [%] x 0.0 [lb SO₂/lb H₂SO₄]

SO₂ [ton/yr] = SO₂ [lb/yr] / 2000 [lb/ton]

CO₂ [ton/yr] = CO₂ [lb/yr] / 2000 [lb/ton]

VOC [ton/yr] = VOC [lb/yr] / 2000 [lb/ton]

HF [ton/yr] = HF [lb/yr] / 2000 [lb/ton]

PM/PM₁₀ [ton/yr] = Hours Operation (8760) [hr/yr] x Area [ft²] x 0.0006 [lb PM/hr-ft²] / 2000 [lb/ton]

PM/PM₁₀ Emission factor is from AP-42 12.20-2 for Chrome Electroplating and Anodizing. Emission factors for aluminum Anodizing have not been determined.

*1 mol NO₂ formed from 2 mol HNO₃, therefore X lbs NO₂ formed from 2*Y lb HNO₃ -- X/Y = 0.365 lb NO₂ per lb HNO₃

** H₂SO₄ -->SO₃ -->SO₂ but only at high temperatures in gas phase (870 degrees fahrenheit) therefore no SO₂ emissions from H₂SO₄

BASIC VOC EMISSIONS CALCULATIONS

VOC FROM MIXTURES (AS APPLIED)

VOC STUDY ON: **NOMENCLATURE**
CARC AND CATALYST 1 MIL IS 0.001 INCHES
PRIMER AND CATALYST 1 GALLON COVERS 1604 SQFT AT 1 MIL

MIXTURE NAME ==	CARC																					
MATERIAL	GALLONS USED PER TIME PERIOD (HR)	PERCENT MATERIAL BY MIXTURE	MATERIAL DENSITY Lb/Gal	POUNDS MATERIAL IN "AS APPLIED" MIXTURE	WEIGHT PERCENT SOLIDS	WEIGHT PERCENT SOLIDS IN "AS APPLIED" MIXTURE	WEIGHT PERCENT VOLATILE IN MATERIAL	WEIGHT PERCENT VOLATILE IN "AS APPLIED" MIXTURE	WEIGHT PERCENT VOC IN MATERIAL	POUNDS VOC IN "AS APPLIED" MIXTURE	WEIGHT PERCENT VOC IN "AS APPLIED" MIXTURE	VOLUME PERCENT VOLATILE IN MATERIAL	VOLUME PERCENT VOLATILE IN "AS APPLIED" MIXTURE	WEIGHT PERCENT WATER IN MATERIAL	WEIGHT PERCENT WATER IN "AS APPLIED" MIXTURE	VOLUME PERCENT WATER IN MATERIAL	VOLUME PERCENT WATER IN "AS APPLIED" MIXTURE					
F93H504 CARC	2	57.14%	10.22	5.84	47.90%	27.37%	52.10%	29.77%	4.20%	0.25	2.56%	64.30%	36.74%	47.90%	27.37%	58.90%	33.66%					
V93V502 CATALYST	1	28.57%	8.88	2.54	74.90%	21.40%	25.10%	7.17%	25.10%	0.64	6.66%	30.70%	8.77%	0.00%	0.00%	0.00%	0.00%					
WATER	0.5	14.29%	8.34	1.19	0.00%	0.00%	100.00%	14.29%	0.00%	0.00	0.00%	100.00%	14.29%	100.00%	14.29%	100.00%	14.29%					
TOTAL GALLONS USED ALL MATERIALS IN THIS MIXTURE	3.5	AS APPLIED Lb/Gal		9.57	AS APPLIED WT % SOLIDS		48.77%	AS APPLIED WT % VOLATILE		51.23%	AS APPLIED WEIGHT % VOC		9.22%	AS APPLIED VOLUME % VOLATILE		59.80%	AS APPLIED WEIGHT % H2O		41.66%	AS APPLIED VOLUME % H2O		47.94%

MIXTURE NAME ==	PRIMER																					
MATERIAL	GALLONS USED PER TIME PERIOD (HR)	PERCENT MATERIAL BY MIXTURE	MATERIAL DENSITY Lb/Gal	POUNDS MATERIAL IN "AS APPLIED" MIXTURE	WEIGHT PERCENT SOLIDS	WEIGHT PERCENT SOLIDS IN "AS APPLIED" MIXTURE	WEIGHT PERCENT VOLATILE IN MATERIAL	WEIGHT PERCENT VOLATILE IN "AS APPLIED" MIXTURE	WEIGHT PERCENT VOC IN MATERIAL	POUNDS VOC IN "AS APPLIED" MIXTURE	WEIGHT PERCENT VOC IN "AS APPLIED" MIXTURE	VOLUME PERCENT VOLATILE IN MATERIAL	VOLUME PERCENT VOLATILE IN "AS APPLIED" MIXTURE	WEIGHT PERCENT WATER IN MATERIAL	WEIGHT PERCENT WATER IN "AS APPLIED" MIXTURE	VOLUME PERCENT WATER IN MATERIAL	VOLUME PERCENT WATER IN "AS APPLIED" MIXTURE					
E90W501 PRIMER	4	66.67%	11.82	7.88	58.60%	39.07%	41.50%	27.67%	8.00%	0.63	6.59%	60.00%	40.00%	33.40%	22.27%	47.60%	31.73%					
V93V505 CATALYST	1	16.67%	7.1	1.18	26.90%	4.48%	73.20%	12.20%	73.10%	0.87	9.04%	76.40%	12.73%	0.00%	0.00%	0.00%	0.00%					
WATER	1	16.67%	8.34	1.39	0.00%	0.00%	100.00%	16.67%	0.00%	0.00	0.00%	100.00%	16.67%	100.00%	16.67%	100.00%	16.67%					
TOTAL GALLONS USED ALL MATERIALS IN THIS MIXTURE	6	AS APPLIED Lb/Gal		10.45	AS APPLIED WT % SOLIDS		43.55%	AS APPLIED WT % VOLATILE		56.53%	AS APPLIED WEIGHT % VOC		15.63%	AS APPLIED VOLUME % VOLATILE		69.40%	AS APPLIED WEIGHT % H2O		38.93%	AS APPLIED VOLUME % H2O		48.40%

METHODOLOGY

The CARC Coating and Primer are mixed on site prior to application.
 % As Applied (Mixture) = Σ % As Applied (Each Component)
 % As Applied = % As Supplied x % Material by Mixture

SURFACE COATING

PM AND VOC EMISSIONS

UNRESTRICTED POTENTIAL TO EMIT

OPERATIONAL MATERIALS	Density (lb/gal)	Weight % Solids	Weight % VOCs	Volume % Solids	Volume % VOCs	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	lb VOC/gal coating (less water and non-VOCs)	PTE VOC (tons/yr)	PTE PM/PM10 (tons/yr)	PTE PM/PM10 After Control (tons/yr)	lb VOC per gal solids	Transfer Efficiency	Overspray Control Efficiency***
CARC PAINT	9.6	48.77%	9.22%	40.20%	11.86%	0.10	100	240	95.70	1.69	38.6	51.11	2.555	2.2	75%	95%
PRIMER	10.5	43.47%	15.63%	30.60%	21.00%	0.25	100	600	261.25	3.17	178.9	124.35	6.218	5.3	75%	95%
CARC PAINT FOR TOUCH UP	9.6	48.77%	9.23%	40.20%	11.86%	0.10	10	24	9.60	1.70	3.9	5.13	0.256	2.2	75%	95%
TOTAL ==											221.38	180.59	9.03			
CLEANING SOLVENTS																
OXSOL-100	11.17	0%	0%	0%	0%	0.001	100	2.40	1.12	0	0	0	0	NA	100%	NA
											0	0	0			

METHODOLOGY

Totals 221.4 180.6 9.0

*All materials "as applied".

**Actual Emissions based on 8 hours per day

***Details for each of the surface coating systems are as follows:

Maximum Usage (gal/day) = [Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]

Maximum Usage (lbs/hr) = [Maximum Usage (gal/day)] * [Density (lb/gal)] / [24 hours/day]

PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]

PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]

PTE of PM/PM10 (tons/yr) = [Density (lbs/gal)] * [Maximum Usage (gal/day)] * [(Weight % Solids)] * [1 - Transfer efficiency] * [365 days/yr] * [1 ton/2000 lbs]

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

Actual Emissions of VOCs (lbs/day) = [Uncontrolled PTE of VOCs (lbs/hour)] * [Actual Hours of Operation (hours/day)]

Total = Worst Case Coatings + Sum of all solvents used

SURFACE COATING

HAP EMISSIONS

UNRESTRICTED POTENTIAL TO EMIT

	Maximum Usage (lbs/hr)	Weight % Co (%)	Weight % HDI (%)	PTE of Co (tons/yr)	PTE of HDI (tons/yr)	TOTAL HAPS (tons/yr)
OPERATIONAL MATERIALS*						
CARC PAINT	95.70	0.40%	0.03%	1.68	0.13	1.80
PRIMER	261.25	0%	0%	0	0	0
CARC PAINT FOR TOUCH UP	9.60	0%	0%	0	0	0
TOTAL FOR OPERATIONAL MATERIALS =				1.68	0.13	

CLEANING SOLVENTS

OX SOL-100	11.17	0%	0%	0	0	0
TOTAL =				0	0	

ACRONYMS

Co = Cobalt

HDI = hexamethylene diisocyanate

PTE of Single HAPs (tons/yr)	1.68	0.13
PTE of Total HAPs (tons/yr)	1.80	

METHODOLOGY

HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] * [Weight % HAP] * [8760 hours/yr] * [1 ton/2000 lbs]

* All materials "as supplied" (same as "as applied" for these materials).

** Coating contains ethylene glycol monobutyl ether (2-Butoxy ethanol) (CAS # 111-76-2), which has been delisted from the list of hazardous air pollutants under 326 IAC 1-2-33.5.

*** Coating Contains naptha (CAS #64742-89-8). Pursuant to 40 CFR 63, chemicals under CAS #64742-89-8 contain 3% by weight Toluene and 3% by weight Xylene.

**** Coating Contains mineral spirits (CAS #64742-88-7). Pursuant to 40 CFR 63, chemicals under CAS #64742-88-7 contain 1% by weight Xylene.

***** Coating Contains aromatic naptha (CAS #64742-95-6). Pursuant to 40 CFR 63, chemicals under CAS #64742-95-6 contain 5% by weight Xylene.

ABRASIVE BLASTING, POWDER PAINTING, DUST COLLECTORS

PM EMISSIONS

Potential to Emit (PTE) PM and PM10

BAGHOUSE ID	Baghouse Outlet Grain Loading (grains/acf)	Baghouse Outlet Air Flow Rate (acfm)	PTE of PM/PM10 BEFORE Controls* (lbs/hr)	PTE of PM/PM10 BEFORE Controls* (tons/yr)	Control Efficiency (%)	PTE of PM/PM10 After Controls* (lbs/hr)	PTE of PM/PM10 After Controls* (tons/yr)	Limited Control Efficiency (%)	Limited PTE of PM/PM10 (lbs/hr)	Limited PTE of PM/PM10 (tons/yr)
AB-1	0.003	1,200	30.86	135.15	99.9%	0.03	0.14	50.0%	15.43	67.58
PP-1	0.0001	1,000	0.01	0.0375	90.0%	0.00086	0.0038	0.0%	0.0086	0.0375
Total			30.87	135.19		0.03	0.14		15.44	67.61

326 IAC 6-3-2 Allowable PM Emission Rate

Baghouse ID	Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
AB-1	500	0.25	1.62
PP-1	5.75	0.0029	0.08

METHODOLOGY

Potential to Emit PM/PM10 After Controls (lbs/hr) = [Baghouse Outlet Grain Loading (grains/acf)] * [Baghouse Outlet Air Flow Rate (acfm)] * [60 min/hr] * [lbs/7000 grains]
 Potential to Emit PM/PM10 After Controls (tons/yr) = [Potential to Emit PM/PM10 After Controls (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]

*Particulate controls are integral to the normal BLASTING operation of the facility.
 Actual emissions for woodworking particulate matter are to be calculated after consideration of the controls. 326IAC 2-7-1 (21)
 PM = Particulate Matter, PM-10 = Particulate Matter less than 10 micrometers, PTE = Potential to Emit

326 IAC 6-3-2 Allowable PM Emission Rate = 4.10 * [Process Weight Rate (tons/hr)]^0.67

AB-1 uses aluminum oxide blasting media.

NATURAL GAS COMBUSTION

HEATING UNITS <100 MMBTU/HR

Emission Unit	Number of Units	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/hr	Potential Throughput MMCF/yr	Pollutant					
					CO	NOx**	PM*	PM10*	SO2	VOC
					Emission Factor (lb/MMCF)					
					84.0	100	1.9	7.6	0.6	5.5
					Potential Emission tons/yr					
					CO	NOx**	PM*	PM10*	SO2	VOC
CO-1 (CARC CURE OVEN)	1	3.50	0.003	29.20	1.226	1.460	2.8E-02	0.111	8.8E-03	0.080
CO-2 (PRIMER CURE OVEN)	1	3.50	0.003	29.20	1.226	1.460	2.8E-02	0.111	8.8E-03	0.080
CO-3 (TOUCH UP OVEN)	1	0.40	0.000	3.34	0.140	0.167	3.2E-03	0.013	1.0E-03	0.009
B-1 (PROCESS BOILER)	1	3.65	0.003	30.45	1.279	1.523	2.9E-02	0.116	9.1E-03	0.084
BH-4 (COMFORT HEAT)	1	0.20	0.000	1.67	0.070	0.083	1.6E-03	0.006	5.0E-04	0.005
BH-2 (COMFORT HEAT)	1	0.22	0.000	1.84	0.077	0.092	1.7E-03	0.007	5.5E-04	0.005
BH-6 (COMFORT HEAT)	1	0.20	0.000	1.67	0.070	0.083	1.6E-03	0.006	5.0E-04	0.005
BH-5 (COMFORT HEAT)	1	0.32	0.000	2.67	0.112	0.133	2.5E-03	0.010	8.0E-04	0.007
BH-7 (COMFORT HEAT)	1	0.20	0.000	1.67	0.070	0.083	1.6E-03	0.006	5.0E-04	0.005
BH-9 (COMFORT HEAT)	1	0.20	0.000	1.67	0.070	0.083	1.6E-03	0.006	5.0E-04	0.005
BH-8 (COMFORT HEAT)	1	2.00	0.002	16.69	0.701	0.834	1.6E-02	0.063	5.0E-03	0.046
Totals	11	14.39	0.01	120.05	5.042	6.003	0.114	0.456	0.036	0.330

Pollutant	Benzene	DCB	Formaldehyde	Hexane	Toluene	Ni	Cr	Cd	Mn	Pb	
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	2.1E-03	1.4E-03	1.1E-03	3.8E-04	5.0E-04	
Potential Emission tons/yr											
Emission Unit	Benzene	DCB	Formaldehyde	Hexane	Toluene	Ni	Cr	Cd	Mn	Pb	TOTAL
CO-1 (CARC CURE OVEN)	3.1E-05	1.8E-05	1.1E-03	2.6E-02	5.0E-05	3.1E-05	2.0E-05	1.6E-05	5.5E-06	7.3E-06	2.8E-02
CO-2 (PRIMER CURE OVEN)	3.1E-05	1.8E-05	1.1E-03	2.6E-02	5.0E-05	3.1E-05	2.0E-05	1.6E-05	5.5E-06	7.3E-06	2.8E-02
CO-3 (TOUCH UP OVEN)	3.5E-06	2.0E-06	1.3E-04	3.0E-03	5.7E-06	3.5E-06	2.3E-06	1.8E-06	6.3E-07	8.3E-07	3.1E-03
B-1 (PROCESS BOILER)	3.2E-05	1.8E-05	1.1E-03	2.7E-02	5.2E-05	3.2E-05	2.1E-05	1.7E-05	5.8E-06	7.6E-06	2.9E-02
BH-4 (COMFORT HEAT)	1.8E-06	1.0E-06	6.3E-05	1.5E-03	2.8E-06	1.8E-06	1.2E-06	9.2E-07	3.2E-07	4.2E-07	1.6E-03
BH-2 (COMFORT HEAT)	1.9E-06	1.1E-06	6.9E-05	1.7E-03	3.1E-06	1.9E-06	1.3E-06	1.0E-06	3.5E-07	4.6E-07	1.7E-03
BH-6 (COMFORT HEAT)	1.8E-06	1.0E-06	6.3E-05	1.5E-03	2.8E-06	1.8E-06	1.2E-06	9.2E-07	3.2E-07	4.2E-07	1.6E-03
BH-5 (COMFORT HEAT)	2.8E-06	1.6E-06	1.0E-04	2.4E-03	4.5E-06	2.8E-06	1.9E-06	1.5E-06	5.1E-07	6.7E-07	2.5E-03
BH-7 (COMFORT HEAT)	1.8E-06	1.0E-06	6.3E-05	1.5E-03	2.8E-06	1.8E-06	1.2E-06	9.2E-07	3.2E-07	4.2E-07	1.6E-03
BH-9 (COMFORT HEAT)	1.8E-06	1.0E-06	6.3E-05	1.5E-03	2.8E-06	1.8E-06	1.2E-06	9.2E-07	3.2E-07	4.2E-07	1.6E-03
BH-8 (COMFORT HEAT)	1.8E-05	1.0E-05	6.3E-04	1.5E-02	2.8E-05	1.8E-05	1.2E-05	9.2E-06	3.2E-06	4.2E-06	1.6E-02
Totals	1.3E-04	7.2E-05	4.5E-03	0.108	2.0E-04	1.3E-04	8.4E-05	6.6E-05	2.3E-05	3.0E-05	1.1E-01

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

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

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

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

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

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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter

NOx = Nitrous Oxides

DCB = Dichlorobenzene

Cr = Chromium

PM10 = Particulate Matter (<10 um)

VOC = Volatile Organic Compounds

Pb = Lead

Mn = Manganese

SO2 = Sulfur Dioxide

CO = Carbon Monoxide

Cd = Cadmium

Ni = Nickel



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: Jacinda Edman
Imagineering Enterprises, Inc
1302 W Sample St
South Bend, IN 46619

DATE: January 13, 2011

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

SUBJECT: Final Decision
Title V
141-29765-00574

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:

F. James Hammer (CEO/President)
Chris Heaton (Industrial Safety & Environmental Services, Inc)
Robert Bator (Imagineering Enterprises, Inc)
Eli Russi (Imagineering Enterprises, Inc)
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

January 13, 2011

TO: South Bend Public Library

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

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

Applicant Name: Imagineering Enterprises, Inc
Permit Number: 141-29765-00574

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 1/13/2011 Imagineering Enterprises, Inc 141-29765-00574 (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		Jacinda Edman Imagineering Enterprises, Inc 1302 W Sample St South Bend IN 46619-3895 (Source CAATS) via confirmed delivery										
2		F James Hammer CEO/ President Imagineering Enterprises, Inc 1302 W Sample St South Bend IN 46619-3895 (RO CAATS)										
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
5		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
6		South Bend City Council / Mayors Office 227 W. Jefferson Blvd. South Bend IN 46601 (Local Official)										
7		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)										
8		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 (Health Department)										
9		South Bend Public Library 304 South Main Street South Bend IN 46601 (Library)										
10		Mr. Chris Heaton Industrial Safety and Environmental Services, Inc. 30723 Old US 20 Elkhart IN 46514 (Consultant)										
11		PAI Properties PO Box 30 South Bend IN 46624 (Affected Party)										
12		Roland Veronneau PO Box 131 Waterbury CT 06720 (Affected Party)										
13		Alt & Witzig 3725 Foundation Ct. Suite A South Bend IN 46628 (Affected Party)										
14		Seimens 3725 Foundation Ct. Suite B South Bend IN 46628 (Affected Party)										
15		US Filter 3725 Foundation Ct. Suite C South Bend IN 46628 (Affected Party)										

Total number of pieces Listed by Sender 14	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Theta Ridge Coffee 3725 Foundation Ct. Suite E South Bend IN 46628 (Affected Party)										
2		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
3		Mr. Robert Bator Imagineering Enterprises, Inc 1302 West Sample St South Bend IN 46619 (Source & addl contact)										
4		Mr. Eli Russi Imagineering Enterprises, Inc 1302 West Sample St South Bend In 46619 (Source & addl contact)										
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14												
15												

Total number of pieces Listed by Sender 4	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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