



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 29, 2011

RE: Genesis Casket Company, LLC / 097-30263-00675

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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

**Genesis Casket Company, LLC
3011 N. Franklin Road
Indianapolis, Indiana 46226**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: M097-30263-00675	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 29, 2011 Expiration Date: April 29, 2016

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary burial casket manufacturing facility.

Source Address:	3011 N. Franklin Road, Indianapolis, Indiana 46226
General Source Phone Number:	(859) 630-9729
SIC Code:	3995
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) burial casket manufacturing line, approved for construction in 2011, with a maximum capacity of 15.625 caskets per hour, and consisting of:
 - (1) One (1) five stage conveyORIZED spray washer process, consisting of:
 - (A) One (1) Stage One alkaline spray application with 64 spray nozzles and a maximum spray capacity of 3.5 gallons per minute per nozzle;
 - (B) One (1) Stage One wetting process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
 - (C) One (1) natural gas-fired Stage One washer burner, identified as G101, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack 103;
 - (D) One (1) Stage Two water rinse spray application with 36 nozzles and a maximum spray capacity of 3.1 gallons per minute per nozzle;
 - (E) One (1) Stage Two wetting process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
 - (F) One (1) Stage Three RO rinse spray application with 36 nozzles and a maximum spray capacity of 3.1 gallons per minute per nozzle;
 - (G) One (1) Stage Three rinse halo process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
 - (H) One (1) Stage Four zirconium spray application with 36 nozzles and a

- maximum spray capacity of 3.4 gallons per minute per nozzle;
- (I) One (1) Stage Four wetting process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute;
 - (J) One (1) Stage Five RO rinse spray application with 36 nozzles and a maximum spray capacity of 3.1 gallons per minute per nozzle; and
 - (K) One (1) Stage Five rinse halo process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
- (2) One (1) natural gas-fired Dry-Off Oven, identified as G102, with a maximum heat input capacity of 1.50 MMBtu/hr, exhausting to stack 106.
 - (3) One (1) Robotic Spray Primer application process, consisting of:
 - (A) One (1) coating booth, identified as Booth #1, applying primer, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 107;
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #1; and
 - (C) One (1) natural gas-fired prime cure oven, identified as G103, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack 110.
 - (4) One (1) Cover Brushing operation, consisting of two (2) stroke sanders, utilizing a dust collector for particulate control, and exhausting within the building.
 - (5) One (1) Box Brushing operation, consisting of two (2) stroke sanders, utilizing a dust collector for particulate control, and exhausting within the building.
 - (6) One (1) Manual Spray Paint application process, consisting of:
 - (A) One (1) coating booth, identified as Booth #2, applying a shade coat, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 111; and
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #2.
 - (7) One (1) Robotic Spray Paint application process, consisting of:
 - (A) One (1) coating booth, identified as Booth #3, applying base coat and shading, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 112;
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #3a; and
 - (C) One (1) heated flash tunnel, identified as Flash Tunnel #3b, equipped with a natural gas-fired burner, identified as G104, with a maximum heat input capacity of 1.00 MMBtu/hr, and exhausting to stack 113.
 - (8) One (1) Robotic Spray Paint application process, consisting of:
 - (A) One (1) coating booth, identified as Booth #4, applying clear coat, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 114;

- (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #4; and
 - (C) One (1) natural gas-fired topcoat cure oven, identified as G105, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack 117.
- (b) One (1) weld grinding operation, approved for construction in 2011, with a combined maximum capacity of 15.625 caskets per hour, utilizing a dust collector for particulate control, exhausting within the building, and consisting of:
 - (1) Four (4) shell grinders; and
 - (2) Four (4) cap grinders.
 - (c) Three (3) Robot MIG welders, approved for construction in 2011, each with a maximum capacity of 5.4 pounds of welding wire per hour, utilizing a dust collector for particulate control, and exhausting within the building.
 - (d) Two (2) hand operated MIG welders, approved for construction in 2011, each with a maximum capacity of 5.4 pounds of welding wire per hour, utilizing a dust collector for particulate control, and exhausting within the building.
 - (e) Two (2) robot laser welders, approved for construction in 2011, utilizing a dust collector for particulate control, and exhausting within the building.
 - (f) One (1) laser cutter, approved for construction in 2011, utilizing a dust collector for particulate control, and exhausting within the building.
 - (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) air make-up unit, identified as G106, with a maximum heat input capacity of 0.715 MMBtu/hr, exhausting to stack 201.
 - (2) One (1) air make-up unit, identified as G107, with a maximum heat input capacity of 1.54 MMBtu/hr, exhausting to stack 202.
 - (h) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP:
 - (1) One (1) Stage One alkaline cleaner storage tank with a maximum capacity of 1615 gallons.
 - (2) One (1) Stage Two water rinse storage tank with a maximum capacity of 355 gallons.
 - (3) One (1) Stage Three RO rinse storage tank with a maximum capacity of 370 gallons.
 - (4) One (1) Stage Four zirconium storage tank with a maximum capacity of 480 gallons.
 - (5) One (1) Stage Five RO rinse storage tank with a maximum capacity of 515 gallons.

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

- (a) This permit, M097-30263-00675, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M097-30263-00675 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.14 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

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

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.20 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 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.3 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.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.10 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

C.13 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) burial casket manufacturing line, approved for construction in 2011, with a maximum capacity of 15.625 caskets per hour, and consisting of:
 - (1) One (1) five stage conveyORIZED spray washer process, consisting of:
 - (A) One (1) Stage One alkaline spray application with 64 spray nozzles and a maximum spray capacity of 3.5 gallons per minute per nozzle;
 - (B) One (1) Stage One wetting process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
 - (C) One (1) natural gas-fired Stage One washer burner, identified as G101, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack 103;
 - (D) One (1) Stage Two water rinse spray application with 36 nozzles and a maximum spray capacity of 3.1 gallons per minute per nozzle;
 - (E) One (1) Stage Two wetting process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
 - (F) One (1) Stage Three RO rinse spray application with 36 nozzles and a maximum spray capacity of 3.1 gallons per minute per nozzle;
 - (G) One (1) Stage Three rinse halo process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
 - (H) One (1) Stage Four zirconium spray application with 36 nozzles and a maximum spray capacity of 3.4 gallons per minute per nozzle;
 - (I) One (1) Stage Four wetting process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute;
 - (J) One (1) Stage Five RO rinse spray application with 36 nozzles and a maximum spray capacity of 3.1 gallons per minute per nozzle; and
 - (K) One (1) Stage Five rinse halo process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
 - (2) One (1) natural gas-fired Dry-Off Oven, identified as G102, with a maximum heat input capacity of 1.50 MMBtu/hr, exhausting to stack 106.
 - (3) One (1) Robotic Spray Primer application process, consisting of:
 - (A) One (1) coating booth, identified as Booth #1, applying primer, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 107;
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #1; and
 - (C) One (1) natural gas-fired prime cure oven, identified as G103, with a maximum

heat input capacity of 2.00 MMBtu/hr, exhausting to stack 110.

- (4) One (1) Cover Brushing operation, consisting of two (2) stroke sanders, utilizing a dust collector for particulate control, and exhausting within the building.
- (5) One (1) Box Brushing operation, consisting of two (2) stroke sanders, utilizing a dust collector for particulate control, and exhausting within the building.
- (6) One (1) Manual Spray Paint application process, consisting of:
 - (A) One (1) coating booth, identified as Booth #2, applying a shade coat, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 111; and
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #2.
- (7) One (1) Robotic Spray Paint application process, consisting of:
 - (A) One (1) coating booth, identified as Booth #3, applying base coat and shading, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 112;
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #3a; and
 - (C) One (1) heated flash tunnel, identified as Flash Tunnel #3b, equipped with a natural gas-fired burner, identified as G104, with a maximum heat input capacity of 1.00 MMBtu/hr, and exhausting to stack 113.
- (8) One (1) Robotic Spray Paint application process, consisting of:
 - (A) One (1) coating booth, identified as Booth #4, applying clear coat, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 114;
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #4; and
 - (C) One (1) natural gas-fired topcoat cure oven, identified as G105, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack 117.

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

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

D.1.1 Particulate Matter (PM) Limitations [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the coating operations, identified as Booths #1 through #4, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.2 Particulate [326 IAC 6.5-1-2(a)]

- (a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the coating booths, identified as Booths #1 through #4, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.
- (b) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the cover brushing operations shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (c) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the box brushing operations shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.1.3 Volatile Organic Compounds (VOC) Limitation [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the source shall comply with the following:

The combined VOC usage, including coatings, dilution solvents and cleaning solvents, for the surface coating spray booths (Booth #1, Booth #2, Booth #3, and Booth #4) making up the burial casket manufacturing line, shall be less than 24.90 tons per 12 consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions from the surface coating spray booths to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the coating operations, identified as Booths #1 through #4, the cover brushing operation, and the box brushing operation, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Particulate Control [326 IAC 6-3-2][326 IAC 6.5-1-2(a)]

In order to ensure compliance with Conditions D.1.1(a) and D.1.2, the dry filters, waterwash or equivalent control device for particulate control shall be in operation and control emissions from the coating operations, identified as Booths #1 through #4, at all times that Booths #1 through #4 are in operation. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.6 Volatile Organic Compounds (VOCs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.1.3 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.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.3:
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month; and
 - (4) Total VOC usage for each compliance period;
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.3 shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) weld grinding operation, approved for construction in 2011, with a combined maximum capacity of 15.625 caskets per hour, utilizing a dust collector for particulate control, exhausting within the building, and consisting of:
 - (1) Four (4) shell grinders; and
 - (2) Four (4) cap grinders.
- (c) Three (3) Robot MIG welders, approved for construction in 2011, each with a maximum capacity of 5.4 pounds of welding wire per hour, utilizing a dust collector for particulate control, and exhausting within the building.
- (d) Two (2) hand operated MIG welders, approved for construction in 2011, each with a maximum capacity of 5.4 pounds of welding wire per hour, utilizing a dust collector for particulate control, and exhausting within the building.
- (e) Two (2) robot laser welders, approved for construction in 2011, utilizing a dust collector for particulate control, and exhausting within the building.
- (f) One (1) laser cutter, approved for construction in 2011, utilizing a dust collector for particulate control, and exhausting within the building.

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

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

D.2.1 Particulate [326 IAC 6.5-1-2(a)]

- (a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the weld grinding operation, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (b) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the MIG and laser welders shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
- (c) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the laser cutter shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the shell grinders, cap grinders, MIG welders, laser welders, and laser cutter and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

FESOP Quarterly Report

Source Name: Genesis Casket Company, LLC
Source Address: 3011 N. Franklin Road, Indianapolis, IN 46226
MSOP Permit No.: M097-30263-00675
Facility: Burial Casket Manufacturing Line (Coating Booths: Booth #1 through Booth #4)
Parameter: Combined VOC usage
Limit: The combined VOC usage, including coatings, dilution solvents and cleaning solvents, for the surface coating spray booths (Booth #1, Booth #2, Booth #3, and Booth #4) shall be less than 24.90 tons per 12 consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Genesis Casket Company, LLC
Address:	3011 N. Franklin Road
City:	Indianapolis, Indiana 46226
Phone #:	(859) 630-9729
MSOP #:	M097-30263-00675

I hereby certify that Genesis Casket Company, LLC is :

still in operation.

no longer in operation.

I hereby certify that Genesis Casket Company, LLC is :

in compliance with the requirements of MSOP M097-30263-00675.

not in compliance with the requirements of MSOP M097-30263-00675.

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

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

Noncompliance:

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Genesis Casket Company, LLC
3011 N. Franklin Road
Indianapolis, Indiana 46226

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 Genesis Casket Company, LLC 3011 N. Franklin Road, Indianapolis, Indiana 46226, completed construction of the burial casket manufacturing facility on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on February 24, 2011 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M097-30263-00675, Plant ID No. 097-00675 issued on _____.

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**

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

Source Description and Location

Source Name: Genesis Casket Company, LLC
Source Location: 3011 N. Franklin Road, Indianapolis, IN 46226
County: Marion
SIC Code: 3995
Operation Permit No.: M 097-30263-00675
Permit Reviewer: Jason R. Krawczyk

On February 24, 2011, the Office of Air Quality (OAQ) received an application from Genesis Casket Company, LLC related to the construction and operation of a new burial casket manufacturing facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

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

- (b) **PM_{2.5}**
Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Genesis Casket Company, LLC on February 24, 2011, relating to the construction and operation of a new burial casket manufacturing facility.

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

- (a) One (1) burial casket manufacturing line, approved for construction in 2011, with a maximum capacity of 15.625 caskets per hour, and consisting of:
- (1) One (1) five stage conveyerized spray washer process, consisting of:
 - (A) One (1) Stage One alkaline spray application with 64 spray nozzles and a maximum spray capacity of 3.5 gallons per minute per nozzle;
 - (B) One (1) Stage One wetting process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
 - (C) One (1) natural gas-fired Stage One washer burner, identified as G101, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack 103;
 - (D) One (1) Stage Two water rinse spray application with 36 nozzles and a maximum spray capacity of 3.1 gallons per minute per nozzle;
 - (E) One (1) Stage Two wetting process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
 - (F) One (1) Stage Three RO rinse spray application with 36 nozzles and a maximum spray capacity of 3.1 gallons per minute per nozzle;
 - (G) One (1) Stage Three rinse halo process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.

- (H) One (1) Stage Four zirconium spray application with 36 nozzles and a maximum spray capacity of 3.4 gallons per minute per nozzle;
 - (I) One (1) Stage Four wetting process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute;
 - (J) One (1) Stage Five RO rinse spray application with 36 nozzles and a maximum spray capacity of 3.1 gallons per minute per nozzle; and
 - (K) One (1) Stage Five rinse halo process with 4 nozzles, each with a maximum spray capacity of 0.5 gallons per minute.
- (2) One (1) natural gas-fired Dry-Off Oven, identified as G102, with a maximum heat input capacity of 1.50 MMBtu/hr, exhausting to stack 106.
- (3) One (1) Robotic Spray Primer application process, consisting of:
- (A) One (1) coating booth, identified as Booth #1, applying primer, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 107;
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #1; and
 - (C) One (1) natural gas-fired prime cure oven, identified as G103, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack 110.
- (4) One (1) Cover Brushing operation, consisting of two (2) stroke sanders, utilizing a dust collector for particulate control, and exhausting within the building.
- (5) One (1) Box Brushing operation, consisting of two (2) stroke sanders, utilizing a dust collector for particulate control, and exhausting within the building.
- (6) One (1) Manual Spray Paint application process, consisting of:
- (A) One (1) coating booth, identified as Booth #2, applying a shade coat, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 111; and
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #2.
- (7) One (1) Robotic Spray Paint application process, consisting of:
- (A) One (1) coating booth, identified as Booth #3, applying base coat and shading, using air atomized airless spray application of coating, utilizing fabric filters as particulate control, and exhausting to stack 112;
 - (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #3a; and
 - (C) One (1) heated flash tunnel, identified as Flash Tunnel #3b, equipped with a natural gas-fired burner, identified as G104, with a maximum heat input capacity of 1.00 MMBtu/hr, and exhausting to stack 113.
- (8) One (1) Robotic Spray Paint application process, consisting of:
- (A) One (1) coating booth, identified as Booth #4, applying clear coat, using air atomized airless spray application of coating, utilizing fabric filters as particulate

- control, and exhausting to stack 114;
- (B) One (1) non-heated flash tunnel, identified as Flash Tunnel #4; and
 - (C) One (1) natural gas-fired topcoat cure oven, identified as G105, with a maximum heat input capacity of 2.00 MMBtu/hr, exhausting to stack 117.
- (b) One (1) weld grinding operation, approved for construction in 2011, with a combined maximum capacity of 15.625 caskets per hour, utilizing a dust collector for particulate control, exhausting within the building, and consisting of:
- (1) Four (4) shell grinders; and
 - (2) Four (4) cap grinders.
- (c) Three (3) Robot MIG welders, approved for construction in 2011, each with a maximum capacity of 5.4 pounds of welding wire per hour, utilizing a dust collector for particulate control, and exhausting within the building.
- (d) Two (2) hand operated MIG welders, approved for construction in 2011, each with a maximum capacity of 5.4 pounds of welding wire per hour, utilizing a dust collector for particulate control, and exhausting within the building.
- (e) Two (2) robot laser welders, approved for construction in 2011, utilizing a dust collector for particulate control, and exhausting within the building.
- (f) One (1) laser cutter, approved for construction in 2011, utilizing a dust collector for particulate control, and exhausting within the building.
- (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
- (1) One (1) air make-up unit, identified as G106, with a maximum heat input capacity of 0.715 MMBtu/hr, exhausting to stack 201.
 - (2) One (1) air make-up unit, identified as G107, with a maximum heat input capacity of 1.54 MMBtu/hr, exhausting to stack 202.
- (h) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP:
- (1) One (1) Stage One alkaline cleaner storage tank with a maximum capacity of 1615 gallons.
 - (2) One (1) Stage Two water rinse storage tank with a maximum capacity of 355 gallons.
 - (3) One (1) Stage Three RO rinse storage tank with a maximum capacity of 370 gallons.
 - (4) One (1) Stage Four zirconium storage tank with a maximum capacity of 480 gallons.
 - (5) One (1) Stage Five RO rinse storage tank with a maximum capacity of 515 gallons.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	47.60
PM10 ⁽¹⁾	47.78
PM2.5	47.77
SO ₂	0.03
NO _x	4.71
VOC	41.96
CO	3.96

(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)
Hexane	0.08
Ethylbenzene	1.65
Methyl Isobutyl Ketone	2.83
Glycol Ethers	2.73
Xylenes	8.12
Toluene	2.01
Manganese	0.06
Combined HAPs	17.50

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM10, PM2.5, and VOC are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.09	0.36	0.36	0.03	4.71	0.26	3.96	0.09	0.09 Hexane
Coating Operations									
Booth #1	13.70	13.70	13.70	-	-	24.90	-	5.61	2.83 MIK
Booth #2	0.14	0.14	0.14	-	-		-	0.04	0.03 Xylenes
Booth #3	10.63	10.63	10.63	-	-		-	11.65	8.09 Xylenes
Booth #4	4.16	4.16	4.16	-	-		-	0.05	0.05 Ethylbenzene
Brushing Operations	0.57	0.57	0.57	-	-	-	-	-	-
Welding/Cutting	0.65	0.65	0.65	-	-	-	-	0.06	0.06 Manganese
Weld Grinding	17.55	17.55	17.55	-	-	-	-	negl.	negl.
Paved Roadways (Fugitive)	0.11	0.02	0.01	-	-	-	-	-	-
Total PTE of Entire Source	47.60	47.78	47.77	0.03	4.71	25.16	3.96	17.50	8.12 Xylenes
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	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".									

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the source shall comply with the following:

- (1) The combined VOC usage, including coatings, dilution solvents and cleaning solvents, for the surface coating spray booths (Booth #1, Booth #2, Booth #3, and Booth #4) making up the burial casket manufacturing line shall be less than 24.90 tons per 12 consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit VOC emissions from the surface coating spray booths to less than 25 tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit, since the five (5) storage tanks each have a storage capacity less than 75 cubic meters, and they are not used to store volatile organic liquids (VOL).

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source is not a major source, located at a major source, or part of a major source of emissions of HAP.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, are not included in the permit, since this source does not perform paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, or spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11514, Subpart XXXXXX, are not included in the permit, since the source is not primarily engaged in operations which are classified in one of the nine source categories listed in this NESHAP.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an

area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Pursuant to 326 IAC 8-2-9(b)(6), the application of coatings to burial caskets (Standard Industrial Classification Code 3995) is exempt from the requirements of 326 IAC 8-2-9 if the source is not located in or adjacent to a county designated as nonattainment for ozone, or is not located in Clark or Floyd County. This source will be located in Marion County which is not designated as nonattainment for ozone or adjacent to a county that is nonattainment for ozone. Therefore, the requirements of 326 IAC 8-2-9 are not applicable and are not included in the permit.

Burial Casket Manufacturing Line

Conveyorized Spray Washer Process

- (i) 326 IAC 8-3-4 (Conveyorized Degreaser Operation)
The Five Stage conveyorized spray washer process does not use organic solvents in its degreasing process, therefore the requirements of 326 IAC 8-3-4 are not applicable and are not included in this permit.
- (j) 326 IAC 8-3-7 (Conveyorized Degreaser Operation and Control)
The Five Stage conveyorized spray washer process does not use organic solvents in its degreasing process, therefore the requirements of 326 IAC 8-3-7 are not applicable and are not included in this permit.

Coating Operations

- (k) 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the coating operations, identified as Booths #1 through #4, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (1) The source shall operate the control device in accordance with manufacturer's specifications.
- (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (A) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

- (l) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the coating booths identified as Booths #1 through #4, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.

In order to ensure compliance with 326 IAC 6.5-1-2(a), the source shall comply with the requirements of 326 IAC 6-3-2(d) and shall operate the control device at all times, in accordance with manufacturer's specifications.

- (m) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from the burial casket manufacturing line is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the burial casket manufacturing line to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the facility shall be limited as follows:

- (1) The combined VOC usage, including coatings, dilution solvents and cleaning solvents, for the surface coating spray booths (Booth #1, Booth #2, Booth #3, and Booth #4) making up the burial casket manufacturing line, shall be less than 24.90 tons per 12 consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions from the surface coating spray booths to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

Cover and Box Brushing Operations

- (n) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the cover and box brushing operations shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.

Weld Grinding

- (o) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the weld grinding operation shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Welding Operations

- (p) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the MIG and laser welders shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Cutting Operations

- (q) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the laser cutter shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Compliance Determination, Monitoring and Testing Requirements
--

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:
- (1) Pursuant to 326 IAC 6-3-2(d), particulate from the coating operations, identified as Booths #1 through #4, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.
 - (2) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), the source shall prepare or obtain from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets in order to comply with the VOC usage limit. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) There are no testing requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 24, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M097-30263-00675. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5174 or toll free at 1-800-451-6027 extension 4-5174.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

SUMMARY OF EMISSIONS

Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: M097-30263-00675
Plt ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 10, 2011

Uncontrolled / Unlimited Emissions (Tons/Yr)										
Pollutant	Natural Gas Combustion	Coating Operations				Box & Cap Brushing	Welding / Cutting	Weld Grinding	Roadways (Fugitive)	Total
		Booth 1	Booth 2	Booth 3	Booth 4					
PM	0.09	13.70	0.14	10.63	4.16	0.57	0.65	17.55	0.11	47.60
PM10	0.36	13.70	0.14	10.63	4.16	0.57	0.65	17.55	0.02	47.78
PM2.5	0.36	13.70	0.14	10.63	4.16	0.57	0.65	17.55	0.01	47.77
VOC	0.26	18.13	0.10	14.73	8.75	-	-	-	-	41.96
NOx	4.71	-	-	-	-	-	-	-	-	4.71
SO2	0.03	-	-	-	-	-	-	-	-	0.03
CO	3.96	-	-	-	-	-	-	-	-	3.96
Single HAP (Xylenes)	-	-	0.03	8.09	-	-	-	-	-	8.12
Combined HAPs	0.09	5.61	0.04	11.65	0.05	-	0.06	-	-	17.50

Controlled / Unlimited Emissions (Tons/Yr)										
Pollutant	Natural Gas Combustion	Coating Operations				Box & Cap Brushing	Welding / Cutting	Weld Grinding	Roadways (Fugitive)	Total
		Booth 1	Booth 2	Booth 3	Booth 4					
PM	0.09	0.69	0.01	0.53	0.21	0.03	0.65	0.88	0.11	3.19
PM10	0.36	0.69	0.01	0.53	0.21	0.03	0.65	0.88	0.02	3.37
PM2.5	0.36	0.69	0.01	0.53	0.21	0.03	0.65	0.88	0.01	3.35
VOC	0.26	18.13	0.10	14.73	8.75	-	-	-	-	41.96
NOx	4.71	-	-	-	-	-	-	-	-	4.71
SO2	0.03	-	-	-	-	-	-	-	-	0.03
CO	3.96	-	-	-	-	-	-	-	-	3.96
Single HAP (Xylenes)	-	-	0.03	8.09	-	-	-	-	-	8.12
Combined HAPs	0.09	5.61	0.04	11.65	0.05	-	0.06	-	-	17.50

Limited / Uncontrolled Emissions (Tons/Yr)										
Pollutant	Natural Gas Combustion	Coating Operations				Box & Cap Brushing	Welding / Cutting	Weld Grinding	Roadways (Fugitive)	Total
		Booth 1	Booth 2	Booth 3	Booth 4					
PM	0.09	13.70	0.14	10.63	4.16	0.57	0.65	17.55	0.11	47.60
PM10	0.36	13.70	0.14	10.63	4.16	0.57	0.65	17.55	0.02	47.78
PM2.5	0.36	13.70	0.14	10.63	4.16	0.57	0.65	17.55	0.01	47.77
VOC	0.26	24.90				-	-	-	-	25.16
NOx	4.71	-	-	-	-	-	-	-	-	4.71
SO2	0.03	-	-	-	-	-	-	-	-	0.03
CO	3.96	-	-	-	-	-	-	-	-	3.96
Single HAP (Xylenes)	-	-	0.03	8.09	-	-	-	-	-	8.12
Combined HAPs	0.09	5.61	0.04	11.65	0.05	-	0.06	-	-	17.50

**Appendix A: Emissions Calculations
Natural Gas Fired Combustion**

Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: 097-30263-00675
Plt ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 10, 2011

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Unit ID	Stack ID
2.000	17.52	First Stage Washer Burner (G101)	103
1.500	13.14	Dry-Off Oven (G102)	106
2.000	17.52	Prime Oven (G103)	110
1.000	8.76	Flash Tunnel Burner (G104)	113
2.000	17.52	Topcoat Oven (G105)	117
0.715	6.26	Air Make-Up Unit (G106)	201
1.540	13.49	Air Make-Up Unit (G107)	202
10.8	94.2		

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.09	0.36	0.03	4.71	0.26	3.96

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

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

Methodology:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of C

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Fired Combustion**

Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: 097-30263-00675
Pit ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 9, 2011

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.892E-05	5.653E-05	3.533E-03	8.479E-02	1.602E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.355E-05	5.182E-05	6.595E-05	1.790E-05	9.892E-05

Methodology is the same as page 2

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

**Appendix A: Emissions Calculations
VOC and Particulate
From Booth 1 Surface Coating Operations**

Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: 097-30263-00675
Plt ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 10, 2011

Material	Component	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency (%)	Particulate Control Efficiency (%)		
Primer																					
DTM Epoxy Sealer	Part A	13.25	19.30%	4.5%	14.8%	0.0%	64.10%	0.0548	15.625	1.96	1.96	1.68	40.28	7.35	12.02	0.60	3.06	70%	95.00%		
2.1 VOC Epoxy Hardener	Part B	8.66	49.60%	32.8%	16.8%	0.0%	50.40%	0.0183	15.625	1.45	1.45	0.42	9.96	1.82	1.64	0.08	2.89	70%	95.00%		
ULTRASOLV Reducer #5	Reducer	7.28	98.50%	0.0%	98.5%	0.0%	1.40%	0.0183	15.625	7.17	7.17	2.05	49.09	8.96	0.04	0.002	512.20	70%	95.00%		
Booth 1 Total:												4.14	99.33	18.13	13.70	0.69					

Note:
 Primer Ratio = 3:1:1
 Gal. of Mat. (gal/unit) = Annual Paint usage / Maximum Annual Production * Paint Component Ratio
 Maximum (unit/hour) = 375 caskets per 24 hour period (125 caskets per shift)

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzne	Weight % Methyl Isobutyl Ketone	Weight % Glycol Ethers	Ethylbenzene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
DTM Epoxy Sealer	13.25	0.05477	15.625	0.10%	2.00%	0.00%	0.05	0.99	0.00
2.1 VOC Epoxy Hardener	8.66	0.01826	15.625	0.00%	17.00%	0.00%	0.00	1.84	0.00
ULTRASOLV Reducer #5	7.28	0.01826	15.625	0.00%	0.00%	30.00%	0.00	0.00	2.73
Booth 1 Single HAP Total:							0.05	2.83	2.73
Booth 1 Combined HAP Total:							5.61		

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

**Appendix A: Emissions Calculations
VOC and Particulate
From Booth 2 Surface Coating Operations**

Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: 097-30263-00675
Plt ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 10, 2011

Material	Component	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency (%)	Particulate Control Efficiency (%)	
Shade Coat																				
<i>Blue</i>																				
3.5 VOC Basecoat, Blue Shade Coat	Part A	8.87	72.60%	70.6%	2.0%	0.0%	23.40%	0.0028	15.625	0.18	0.18	0.01	0.18	0.03	0.14	0.01	0.76	70%	95.00%	
DIMENSION® Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0007	15.625	0.73	0.73	0.01	0.19	0.03	0.00	0.00	N/A	70%	95.00%	
												0.02	0.37	0.07	0.14	0.01				
<i>Burgundy</i>																				
3.5 VOC Basecoat, Burgandy Shade Coat	Part A	8.84	72.20%	68.5%	3.7%	0.0%	23.90%	0.0028	15.625	0.33	0.33	0.01	0.34	0.06	0.14	0.01	1.37	70%	95.00%	
DIMENSION® Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0007	15.625	0.73	0.73	0.01	0.19	0.03	0.00	0.00	N/A	70%	95.00%	
												0.02	0.53	0.10	0.14	0.01				
<i>Copper</i>																				
3.5 VOC Basecoat, Copper Shade Coat	Part A	8.84	72.10%	68.8%	3.3%	0.0%	24.00%	0.0028	15.625	0.29	0.29	0.01	0.30	0.06	0.14	0.01	1.22	70%	95.00%	
DIMENSION® Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0007	15.625	0.73	0.73	0.01	0.19	0.03	0.00	0.00	N/A	70%	95.00%	
												0.02	0.49	0.09	0.14	0.01				
<i>Clear</i>																				
3.5 VOC Basecoat, Clear Shade Coat	Part A	8.90	73.20%	73.2%	0.0%	0.0%	22.90%	0.0028	15.625	0.00	0.00	0.00	0.00	0.00	0.14	0.01	0.00	70%	95.00%	
DIMENSION® Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0007	15.625	0.73	0.73	0.01	0.19	0.03	0.00	0.00	N/A	70%	95.00%	
												0.01	0.19	0.03	0.14	0.01				
												0.02	0.53	0.10	0.14	0.01				

Booth 2 Total: 0.02 0.53 0.10 0.14 0.01
(Worst Case Coating Usage)

Note:
Shade Coat Ratio = 2 parts Part A, 1/2 part Reducer
Gal. of Mat. (gal/unit) = Annual Paint usage / Maximum Annual Production * Paint Component Ratio
Maximum (unit/hour) = 375 caskets per 24 hour period (125 caskets per shift)
Gallons of material per unit was calculated by dividing the maximum combined annual coating usage by the maximum number of caskets coated per year.

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
3.5 VOC Basecoat, Blue Shade Coat	8.87	0.0028	15.625	1.00%	0.10%	0.02	0.00
3.5 VOC Basecoat, Burgandy Shade Coat	8.84	0.0028	15.625	2.00%	0.30%	0.03	0.01
3.5 VOC Basecoat, Copper Shade Coat	8.84	0.0028	15.625	2.00%	0.30%	0.03	0.01

Booth 2 Single HAP Total: 0.03 0.01
(Worst Case Coating Usage)

Booth 2 Combined HAP Total: 0.04

Methodology:
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Gallons of material per unit was calculated by dividing the maximum combined annual coating usage by the maximum number of caskets coated per year.

Appendix A: Emissions Calculations
VOC and Particulate
From Booth 3 Surface Coating Operations

Company Name: **Genesis Casket Company, LLC**
 Address City IN Zip: **3011 N. Franklin Road, Indianapolis, IN 46226**
 Permit Number: **097-30263-00675**
 Pti ID: **097-00675**
 Reviewer: **Jason R. Krawczyk**
 Date: **March 10, 2011**

Material	Component	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency (%)	Particulate Control Efficiency (%)	
Base Coat																				
<i>Lavender Met</i>																				
3.5 VOC Basecoat, Lavender Met	Part A	8.68	64.80%	45.7%	19.1%	0.0%	29.80%	0.1093	15.625	1.66	1.66	2.83	67.95	12.40	6.86	0.34	5.56	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												3.14	75.41	13.76	6.86	0.34				
<i>Gold Met</i>																				
3.5 VOC Basecoat, Gold Met	Part A	8.69	64.40%	44.8%	19.6%	0.0%	30.10%	0.1093	15.625	1.70	1.70	2.91	69.81	12.74	6.94	0.35	5.66	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												3.22	77.27	14.10	6.94	0.35				
<i>Gris Titane Metal</i>																				
3.5 VOC Basecoat, Gris Titane Metal	Part A	8.72	64.20%	44.8%	19.4%	0.0%	29.80%	0.1093	15.625	1.69	1.69	2.89	69.34	12.65	7.01	0.35	5.68	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												3.20	76.79	14.01	7.01	0.35				
<i>Loam Gray Met</i>																				
3.5 VOC Basecoat, Loam Gray Met	Part A	8.69	67.40%	50.2%	17.2%	0.0%	27.30%	0.1093	15.625	1.49	1.49	2.55	61.26	11.18	6.36	0.32	5.48	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												2.86	68.72	12.54	6.36	0.32				
<i>Cd Blue Met</i>																				
3.5 VOC Basecoat, Cd Blue Met	Part A	8.67	66.00%	47.4%	18.6%	0.0%	29.00%	0.1093	15.625	1.61	1.61	2.75	66.10	12.06	6.61	0.33	5.56	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												3.06	73.55	13.42	6.61	0.33				
<i>Panther Black Met</i>																				
3.5 VOC Basecoat, Panther Black Met	Part A	8.58	67.20%	48.8%	18.4%	0.0%	28.60%	0.1093	15.625	1.58	1.58	2.70	64.71	11.81	6.32	0.32	5.52	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												3.01	72.16	13.17	6.32	0.32				
<i>Brilliant White</i>																				
3.5 VOC Basecoat, Brilliant White	Part A	9.95	53.80%	40.3%	13.5%	0.0%	33.90%	0.1093	15.625	1.34	1.34	2.29	55.06	10.05	10.32	0.52	3.96	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												2.60	62.51	11.41	10.32	0.52				
<i>Dk Reddish Brown Pri</i>																				
3.5 VOC Basecoat, Dk Reddish Brown Pri	Part A	8.61	68.20%	50.9%	17.3%	0.0%	27.40%	0.1093	15.625	1.49	1.49	2.54	61.05	11.14	6.14	0.31	5.44	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												2.85	68.51	12.50	6.14	0.31				
<i>Bronze Beige Met</i>																				
3.5 VOC Basecoat, Bronze Beige Met	Part A	8.67	64.90%	45.6%	19.3%	0.0%	29.70%	0.1093	15.625	1.67	1.67	2.86	68.58	12.52	6.83	0.34	5.63	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												3.17	76.04	13.88	6.83	0.34				
<i>Royal Blue Met</i>																				
3.5 VOC Basecoat, Royal Blue Met	Part A	8.71	67.30%	49.8%	17.5%	0.0%	28.00%	0.1093	15.625	1.52	1.52	2.60	62.47	11.40	6.39	0.32	5.44	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												2.91	69.93	12.76	6.39	0.32				
<i>Brown Mica</i>																				
3.5 VOC Basecoat, Brown Mica	Part A	8.63	67.00%	48.8%	18.2%	0.0%	28.50%	0.1093	15.625	1.57	1.57	2.68	64.38	11.75	6.39	0.32	5.51	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0273	15.625	0.73	0.73	0.31	7.46	1.36	0.00	0.00	N/A	70%	95.00%	
												2.99	71.83	13.11	6.39	0.32				
Accent Stripe Coat																				
<i>Gold Met</i>																				
3.5 VOC Basecoat, Gold Met	Part A	8.69	64.40%	44.8%	19.6%	0.0%	30.10%	0.0048	15.625	1.70	1.70	0.13	3.10	0.56	0.31	0.02	5.66	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0012	15.625	0.73	0.73	0.01	0.33	0.06	0.00	0.00	N/A	70%	95.00%	
												0.14	3.43	0.63	0.31	0.02				
<i>Gris Titane Metal</i>																				
3.5 VOC Basecoat, Gris Titane Metal	Part A	8.72	64.20%	44.8%	19.4%	0.0%	29.80%	0.0048	15.625	1.69	1.69	0.13	3.07	0.56	0.31	0.02	5.68	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0012	15.625	0.73	0.73	0.01	0.33	0.06	0.00	0.00	N/A	70%	95.00%	
												0.14	3.41	0.62	0.31	0.02				
<i>Loam Gray Met</i>																				
3.5 VOC Basecoat, Loam Gray Met	Part A	8.69	67.40%	50.2%	17.2%	0.0%	27.30%	0.0048	15.625	1.49	1.49	0.11	2.72	0.50	0.28	0.01	5.48	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0012	15.625	0.73	0.73	0.01	0.33	0.06	0.00	0.00	N/A	70%	95.00%	
												0.13	3.85	0.56	0.28	0.01				
<i>Panther Black Met</i>																				
3.5 VOC Basecoat, Panther Black Met	Part A	8.58	67.20%	48.8%	18.4%	0.0%	28.60%	0.0048	15.625	1.58	1.58	0.12	2.87	0.52	0.28	0.01	5.52	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0012	15.625	0.73	0.73	0.01	0.33	0.06	0.00	0.00	N/A	70%	95.00%	
												0.13	3.20	0.58	0.28	0.01				
<i>Bronze Beige Met</i>																				
3.5 VOC Basecoat, Bronze Beige Met	Part A	8.67	64.90%	45.6%	19.3%	0.0%	29.70%	0.0048	15.625	1.67	1.67	0.13	3.04	0.55	0.30	0.02	5.63	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0012	15.625	0.73	0.73	0.01	0.33	0.06	0.00	0.00	N/A	70%	95.00%	
												0.14	3.37	0.62	0.30	0.02				
<i>Brown Mica</i>																				
3.5 VOC Basecoat, Brown Mica	Part A	8.63	67.00%	48.8%	18.2%	0.0%	28.50%	0.0048	15.625	1.57	1.57	0.12	2.85	0.52	0.28	0.01	5.51	70%	95.00%	
DIMENSION@ Low VOC Reducer, Medium	Reducer	7.35	100.00%	90.1%	9.9%	0.0%	0.00%	0.0012	15.625	0.73	0.73	0.01	0.33	0.06	0.00	0.00	N/A	70%	95.00%	
												0.13	3.19	0.58	0.28	0.01				

Worst Case Booth 3 Total: 3.36 80.69 14.73 10.63 0.53
 (Sum Worst Case Base Coat + Worst Case Accent Stripe)

Note:
 Base Coat Ratio = 2 parts Part A, 1/2 part Reducer
 Accent Stripe Ratio = 2 parts Part A, 1/2 part Reducer
 Gal. of Mat. (gal/unit) = Annual Paint Usage / Maximum Annual Production * Paint Component Ratio
 Maximum (unit/hour) = 375 caskets per 24 hour period (125 caskets per shift)
 Gallons of material per unit was calculated by dividing the maximum combined annual coating usage by the maximum number of caskets coated per year.

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
Base Coat									
3.5 VOC Basecoat, Lavender Met	8.68	0.1093	15.625	10.00%	2.00%	2.00%	6.49	1.30	1.30
3.5 VOC Basecoat, Gold Met	8.69	0.1093	15.625	11.00%	1.00%	2.00%	7.15	0.65	1.30
3.5 VOC Basecoat, Gris Titane Metal	8.72	0.1093	15.625	9.00%	2.00%	2.00%	5.87	1.30	1.30
3.5 VOC Basecoat, Loam Gray Met	8.69	0.1093	15.625	10.00%	1.00%	2.00%	6.50	0.65	1.30
3.5 VOC Basecoat, Cd Blue Met	8.67	0.1093	15.625	10.00%	1.00%	2.00%	6.49	0.65	1.30
3.5 VOC Basecoat, Panther Black Met	8.58	0.1093	15.625	12.00%	0.00%	2.00%	7.70	0.00	1.28
3.5 VOC Basecoat, Brilliant White	9.95	0.1093	15.625	10.00%	0.00%	2.00%	7.44	0.00	1.49
3.5 VOC Basecoat, Dk Reddish Brown Pri	8.61	0.1093	15.625	10.00%	3.00%	2.00%	6.44	1.93	1.29
3.5 VOC Basecoat, Bronze Beige Met	8.67	0.1093	15.625	10.00%	0.00%	2.00%	6.49	0.00	1.30
3.5 VOC Basecoat, Royal Blue Met	8.71	0.1093	15.625	10.00%	3.00%	2.00%	6.52	1.98	1.30
3.5 VOC Basecoat, Brown Mica	8.63	0.1093	15.625	12.00%	0.00%	2.00%	7.76	0.00	1.29
Accent Stripe Coat									
3.5 VOC Basecoat, Gold Met	8.69	0.0048	15.625	11.00%	1.00%	2.00%	0.32	0.03	0.06
3.5 VOC Basecoat, Gris Titane Metal	8.72	0.0048	15.625	9.00%	2.00%	2.00%	0.26	0.06	0.06
3.5 VOC Basecoat, Loam Gray Met	8.69	0.0048	15.625	10.00%	1.00				

**Appendix A: Emissions Calculations
VOC and Particulate
From Booth 4 Surface Coating Operations**

**Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: 097-30263-00675
Plt ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 10, 2011**

Material	Component	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency (%)	Particulate Control Efficiency (%)	
Clear Coat																				
Ultra 7000 @ 2.1 VOC Appearance Plus Clearcoat	Part A	9.56	55.40%	54.4%	1.0%	0.0%	45.90%	0.0603	15.625	0.10	0.10	0.09	2.16	0.39	2.64	0.13	0.21	85%	95.00%	
Low VOC Speed-Plus Performance Hardener	Part B	9.10	18.80%	0.0%	18.8%	0.0%	76.20%	0.0201	15.625	1.71	1.71	0.54	12.89	2.35	1.52	0.08	2.25	85%	95.00%	
2.1 VOC Reducer, High Temperature	Reducer	8.50	100.00%	48.6%	51.4%	0.0%	0.00%	0.0201	15.625	4.37	4.37	1.37	32.92	6.01	0.00	0.00	N/A	85%	95.00%	
Booth 4 Total:												2.00	47.97	8.75	4.16	0.21				

Note:
Clear Coat Ratio = 3:1:1
Gal. of Mat. (gal/unit) = Annual Paint usage / Maximum Annual Production * Paint Component Ratio
Maximum (unit/hour) = 375 caskets per 24 hour period (125 caskets per shift)

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Ethylbenzene Emissions (ton/yr)
Ultra 7000 @ 2.1 VOC Appearance Plus Clearcoat	9.56	0.0603	15.625	0.10%	0.04
Low VOC Speed-Plus Performance Hardener	9.10	0.0201	15.625	0.10%	0.01
Total:					0.05

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

**Appendix A: Emissions Calculations
Particulate Emissions
From Box and Cap Brushing Operations**

Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: 097-30263-00675
Plt ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 10, 2011

8 Box and Cap Brushing Sanders

Maximum Throughput	Area Brushed	Coating Capacity	Coating Density	Volume % Solids	Uncontrolled Potential to Emit		Control Efficiency	Controlled Potential to Emit	
(unit/hr)	(sq.ft./unit)	(gal/sq.ft.)	(lbs/gal)	(%)	(lb/hr)	(ton/yr)	(%)	(lb/hr)	(ton/yr)
7.38	5.243	6.23E-04	11.14	48.82%	0.13	0.57	95.00%	0.01	0.03

Note:

Maximum Capacity (unit/hr) = Only caskets with brushed finish = 177/day = 59/shift
The Coating Capacity (gal/sq.ft.) assumes a coating applied at a thickness of 0.7 mil and a 70 % transfer efficiency.

Methodology:

Uncontrolled Potential to Emit (lb/hr) = Maximum Throughput (unit/hr) * Area Brushed (sq.ft. / unit) * Coating Capacity (gal/sq.ft.) * Coating Density (lbs/gal) * Volume % Solids (%)
Uncontrolled Potential to Emit (ton/yr) = Uncontrolled Potential to Emit (lb/hr) * 8,760 hrs * 1 ton / 2,000 lbs
Controlled Potential to Emit (lb/hr) = Uncontrolled Potential to Emit (lb/hr) * (1 - Control Efficiency (%))
Controlled Potential to Emit (ton/yr) = Uncontrolled Potential to Emit (ton/yr) * (1 - Control Efficiency (%))

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

**Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: 097-30263-00675
Pit ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 10, 2011**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)		
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr			
WELDING													
Metal Inert Gas (MIG)(carbon steel)	5	5.4		0.0055	0.0005			0.149	0.014	0.0	0.0	0.014	
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
Laser**	2	0.043	23.57		0.0039				0.00047	0.0	0.0	0.0	0.0
EMISSION TOTALS													
Potential Emissions lbs/hr								0.15				0.014	
Potential Emissions lbs/day								3.58				0.32	
Potential Emissions tons/year								0.65				0.06	

Note:
The emission factor for Laser cutting is not available in AP-42 or WebFIRE version 6.25, therefore the emission factor for Plasma cutting was used as a worstcase scenario.
Laser Max. Metal Cutting Rate = 90.5 (inches/casket) * 15.626 (caskets/hr.) * 1 (hr) / 60 (minutes).

Methodology:
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emissions Calculations
Particulate Emissions from Weld Grinding

Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: 097-30263-00675
Pit ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 10, 2011

Eight (8) Weld Grinders

Dimensions of Weld (in/unit)			Density of Steel (lb/in ³)	Max. Throughput	Control Efficiency (%)	Uncontrolled Potential Emissions		Controlled Potential Emissions	
Length	Width	Height				(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
90.5	0.25	0.04	0.2833	15.625	95.00%	4.01	17.55	0.20	0.88

Note:

Assumed PM = PM10 = PM2.5

Methodology:

Uncontrolled Potential Emissions (lbs/hr) = [Weld Length * Weld Width * Weld Height (in³/unit)] * Density of Steel (lb/in³) * Max Throughput (units/hr)

Uncontrolled Potential Emissions (tons/yr) = Potential Emissions (lbs/hr) * 8,760 hrs * 1 ton / 2,000 lbs.

Controlled Potential Emissions (lbs/hr) = Uncontrolled Potential Emissions (lbs/hr) * (1 - Control Efficiency (%))

Controlled Potential Emissions (tons/yr) = Controlled Potential Emissions (lbs/hr) * 1 ton / 2,000 lbs.

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: Genesis Casket Company, LLC
Address City IN Zip: 3011 N. Franklin Road, Indianapolis, IN 46226
Permit Number: 097-30263-00675
Plt ID: 097-00675
Reviewer: Jason R. Krawczyk
Date: March 10, 2011

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	20.0	1.0	20.0	30.0	600.0	400	0.076	1.5	553.0
Vehicle (leaving plant) (one-way trip)	20.0	1.0	20.0	30.0	600.0	400	0.076	1.5	553.0
Total			40.0		1200.0			3.0	1106.1

Average Vehicle Weight Per Trip = $\frac{30.0}{1.0}$ tons/trip
 Average Miles Per Trip = $\frac{1.5}{1.0}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	30.0	30.0	30.0	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m ³ = ubiquitous baseline silt loading value for ADT < 500 - Table 13.2.1-2

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$

where p =	125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =	365	days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	0.222	0.044	0.0109	lb/mile
Mitigated Emission Factor, E_{ext} =	0.203	0.041	0.0100	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.06	0.012	0.003	0.06	0.011	0.003
Vehicle (leaving plant) (one-way trip)	0.06	0.012	0.003	0.06	0.011	0.003
	0.12	0.025	0.006	0.11	0.022	0.006

Methodology

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

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit



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: Denny Knigga
Genesis Casket Company, LLC
3011 N. Franklin Rd
Indianapolis, IN 46226

DATE: April 29, 2011

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

SUBJECT: Final Decision
MSOP
097-30263-00675

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:
Ronald Weszely (Valparaiso Safety & Environmental Consultants, 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

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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
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April 29, 2011

TO: Warren Public Library

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

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

Applicant Name: Genesis Casket Company, LLC
Permit Number: 097-30263-00675

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 4/29/2011 Genesis Casket Company LLC 097-30263-00675 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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		Denny W. Knigga Genesis Casket Company LLC 3011 N Franklin Rd Indianapolis IN 46226 (Source CAATS) via confirmed delivery										
2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
3		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
6		Ms. Kathy Watson 8204 Claridge Rd Indianapolis IN 46260 (Affected Party)										
7		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
8		Warren Library 9701 E 21st Street Indianapolis IN 46229 (Library)										
9		Ronald R. Weszely Valparaiso Safety & Environmental Consultants, Inc 653 West 23rd Street #302 Panama City FL 32405 (Consultant)										
10		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
11		Duke Realty Limited Partnership PO Box 40509 Indianapolis IN 46240 (Affected Party)										
12		New York Central Lines, LLC 500 Water Street, J-910 Jacksonville FL 32202 (Affected Party)										
13		Braun & Sullivan, LLP 6054 E. 10th Street Indianapolis IN 46219 (Affected Party)										
14		Jay D. & Landa R. Ward 8135 E. 30th Street Indianapolis IN 46219 (Affected Party)										
15		Glenn & Katherine S. Condra 3056 Tremont Circle Bargersville IN 46106 (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		Clinton A. Fultz 8580 Cedar Place Drive, Suite 118B Indianapolis IN 46240 (Affected Party)										
2		David H. & Susan A. Athmann PO Box 26603 Indianapolis IN 46226 (Affected Party)										
3		Ballard Realty, LLC 8179 Wade Hill Ct. Indianapolis IN 46256 (Affected Party)										
4		William A. & Maxine S. Murphy 8687 N. Ricks Drive E McCordsville IN 46055 (Affected Party)										
5		Home Owner 3037 Roseway Drive Indianapolis IN 46226 (Affected Party)										
6		Cametta D. Arthur 3043 Roseway Drive Indianapolis IN 46226 (Affected Party)										
7		Robert L. Friddle 3049 Roseway Drive Indianapolis IN 46226 (Affected Party)										
8		John R. & Susan M. Cook 3101 Roseway Drive Indianapolis IN 46226 (Affected Party)										
9		Namasco Corporation 8301 East 33rd Street Indianapolis IN 46226 (Affected Party)										
10		Citadel 3131-A N. Franklin Road Indianapolis IN 46226 (Affected Party)										
11		Vacant Business 3002 N. Franklin Road Indianapolis IN 46226 (Affected Party)										
12		Malone & Sons Cleaners 7933 E. 30th Street Indianapolis IN 46219 (Affected Party)										
13		Mr. Mikes Barber Shop 7935 E. 30th Street Indianapolis IN 46219 (Affected Party)										
14		Beverly Bradford, John & Diane Henry 7941 E. 30th Street Indianapolis IN 46219 (Affected Party)										
15		Trons Tires 8105 E. 30th Street Indianapolis IN 46219 (Affected Party)										

Total number of pieces Listed by Sender 15	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 mail 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 insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Dammanns Lawn & Garden Center 8005 E. 30th St Indianapolis IN 46219 (Affected Party)										
2		AIMS/First Response Oxygen Service 8095 E. 30th Street Indianapolis IN 46219 (Affected Party)										
3		Home Owner 8107 E. 30th Street Indianapolis IN 46219 (Affected Party)										
4		Business Owner 8107A E. 30th Street Indianapolis IN 46219 (Affected Party)										
5		Back Yard Blessings 8119 E. 30th Street Indianapolis IN 46219 (Affected Party)										
6		Kenworthy Plumbing 8141 E. 30th Street Indianapolis IN 46219 (Affected Party)										
7		Business 8145 E. 30th Street Indianapolis IN 46219 (Affected Party)										
8		Professionals, Inc. 8149 E. 30th Street Indianapolis IN 46219 (Affected Party)										
9		Just Packaging Corporation 3131-C N. Franklin Road Indianapolis IN 46226 (Affected Party)										
10		International Metals 3131-E N. Franklin Road Indianapolis IN 46226 (Affected Party)										
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender 10	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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