



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 3, 2011

RE: Draper, Inc. / 065-30553-00029

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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Charles V. Baker
Draper, Inc.
411 South Pearl Street
Spiceland, IN 47385

August 3, 2011

Re: 065-30553-00029
Second Significant Revision to
F065-24217-00029

Dear Mr. Baker:

Draper, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F065-24217-00029 on April 7, 2008 for a stationary window coverings, projection screens, and gymnasium equipment manufacturing source located at 411 South Pearl Street, Spiceland, IN 47385. On May 16, 2011, the Office of Air Quality (OAQ) received an application from the source requesting the addition of a new polyurethane coating operation. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions on this matter, please contact Jason R. Krawczyk, of my staff, at 317-234-5174
or 1-800-451-6027, and ask for extension 4-5174.

Sincerely,



Alfred C. Dumaul, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document
Revised Permit
Revised Calculations

ACD/JRK

cc: File - Henry County
Henry County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

Draper, Inc.
411 South Pearl Street
Spiceland, Indiana 47385

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F065-24217-00029	
Original Signed by: Matt Stuckey, Branch Chief Permits Branch Office of Air Quality	Issuance Date: April 7, 2008 Expiration Date: April 7, 2018

First Administrative Amendment No.: 065-27309-00029, issued March 10, 2009
First Significant Permit Revision No.: 065-28477-00029, issued January 6, 2010

Second Significant Permit Revision No.: 065-30553-00029	
Issued by:  Alfred C. Dumauval, Ph.D, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 3, 2011 Expiration Date: April 7, 2018

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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary window coverings, projection screens and gymnasium equipment manufacturing source.

Source Address:	411 South Pearl Street, Spiceland, Indiana 47385
General Source Phone Number:	765-987-7295
SIC Code:	2591, 3861
County Location:	Henry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) paint spray booth, identified as EU4, constructed in 1995, utilizing an air atomization spray application system, coating a maximum of 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2;
- (b) One (1) paint spray booth, identified as EU8, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;
- (c) One (1) paint spray booth, identified as EU10, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and
- (d) One (1) paint spray booth, identified as EU12, constructed in 2000, utilizing HVLP spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.
- (e) One (1) polyurethane coating operation, identified as EU15, approved for construction in 2011, performing HVLP coating through the use of two applicator guns, with a maximum coating capacity of 3.5 grams per second per coating gun, coating projection screens, using dry filters for particulate matter overspray control, and exhausting to one (1) vent, identified as V1.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) six (6) natural gas fired make-up units, identified as EU1, rated at 1.0 MMBtu/hr; EU3, rated at 0.8 MMBtu/hr; EU5, rated at 0.8 MMBtu; EU7, rated at 1.0 MMBtu; EU9, rated at 0.8 MMBtu/hr; and EU 11, rated at 0.8 MMBtu/hr. The six (6) natural gas fired make-up units have a total heat input capacity of 5.2 million (MM) British thermal units (Btu) per hour.
- (b) nine (9) natural gas fired air rotation units with a total heat input capacity of 11.9 MMBtu/hr.
- (c) twenty one (21) natural gas fired space heaters with a total heat input capacity of 2.45 MMBtu/hr;
- (d) one (1) natural gas fired cure oven, identified as EU13, rated at 4.0 MMBtu/hr, and exhausting through stack S7;
- (e) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: seventeen (17) metal inert gas welding stations, with maximum wire consumption of 2.72 pounds per hour per station; and
- (f) activities with emissions less than or equal to insignificant thresholds:
 - (1) one (1) powder coating operation, identified as Powder coat system #4, coating a maximum of 0.94 units per hour, utilizing electrostatic application method and pulse max collectors for particulate matter control, and exhausting within the building. [326 IAC 6-3-2]
 - (2) one (1) powder coating operation, identified as Powder coat system #7, coating a maximum of 1.88 units per hour, utilizing electrostatic application method and pulse max collectors for particulate matter control, and exhausting within the building. [326 IAC 6-3-2]

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F065-24217-00029, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F065-24217-00029 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 IGCM 1003

Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gasses (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) paint spray booth, identified as EU4, constructed in 1995, utilizing an air atomization spray application system, coating a maximum of 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2;
- (b) One (1) paint spray booth, identified as EU8, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;
- (c) One (1) paint spray booth, identified as EU10, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and
- (d) One (1) paint spray booth, identified as EU12, constructed in 2000, utilizing HVLP spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.
- (e) One (1) polyurethane coating operation, identified as EU15, approved for construction in 2011, performing HVLP coating through the use of two applicator guns, with a maximum coating capacity of 3.5 grams per second per coating gun, coating projection screens, using dry filters for particulate matter overspray control, and exhausting to one (1) vent, identified as V1.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP and PSD Minor Limit [326 IAC 2-8-4][326 IAC 2-2]

The total input of VOC to the five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15), including but not limited to the input of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC emissions from the entire source to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12][326 IAC 8-2-11]

- (a) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the four (4) paint spray booths (EU4, EU8, EU10, and EU12) shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application.

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (b) Pursuant to 326 IAC 8-2-11, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 4.8 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator from a vinyl coating line (EU4, EU8, EU10, EU12, and EU15) when coating vinyl.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The total input of toluene to the five (5) spray coating operations shall be less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total input of xylene to the five (5) spray coating operations shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total input of methyl isobutyl ketone (MIBK) to the five (5) spray coating operations shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The total input of any combination of HAPs to the five (5) spray coating operations shall be less than 24.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit HAP from all other emission units at this source, shall limit HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for each single HAP and less than 25 tons per twelve (12) consecutive month period for any combination of HAPs, and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (MACT) not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15) 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.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP input limitations contained in Conditions D.1.1, D.1.2(b), and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.7 VOC and HAP Emissions

Compliance with Conditions D.1.1, D.1.2(b), and D.1.3 shall be demonstrated no later than 30 days of the end of each month based on the respective total volatile organic compound, and single HAP and total HAP input for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S2, S4, S5, S6 and V1) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to responses steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to responses steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.2(b), and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount used and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent input records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The total VOC input for each month;
 - (4) The total individual and combined HAP input for each month;
 - (5) Total VOC input for each compliance period; and

- (6) Total input of individual and combined HAPs for each compliance period.
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of daily filter inspections, weekly overspray observations, once per day and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the recordkeeping requirements of this requirement.

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2(b), and D.1.3 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - Insignificant Activities:

- (a) six (6) natural gas fired make-up units, identified as EU1, rated at 1.0 MMBtu/hr; EU3, rated at 0.8 MMBtu/hr; EU5, rated at 0.8 MMBtu; EU7, rated at 1.0 MMBtu; EU9, rated at 0.8 MMBtu/hr; and EU 11, rated at 0.8 MMBtu/hr. The six (6) natural gas fired make-up units have a total heat input capacity of 5.2 million (MM) British thermal units (Btu) per hour.
- (b) nine (9) natural gas fired air rotation units with a total heat input capacity of 11.9 MMBtu/hr.
- (c) twenty one (21) natural gas fired space heaters with a total heat input capacity of 2.45 MMBtu/hr;
- (d) one (1) natural gas fired cure oven, identified as EU13, rated at 4.0 MMBtu/hr, and exhausting through stack S7;
- (e) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:

seventeen (17) metal inert gas welding stations, with maximum wire consumption of 2.72 pounds per hour per station; and
- (f) activities or categories not previously identified with emissions less than or equal to insignificant thresholds:
 - (1) one (1) powder coating operation, identified as Powder coat system #4, coating a maximum of 0.94 units per hour, utilizing electrostatic application method and pulse max collectors for particulate matter control, and exhausting within the building. [326 IAC 6-3-2]
 - (2) one (1) powder coating operation, identified as Powder coat system #7, coating a maximum of 1.88 units per hour, utilizing electrostatic application method and pulse max collectors for particulate matter control, and exhausting within the building. [326 IAC 6-3-2]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), particulate matter (PM) from the powder coating operations, identified as powder coat system #4 and powder coat system #7, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15)
Parameter: VOC inputs
Limit: The total input of VOC to the five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15), including but not limited to the input of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	VOC	VOC	VOC
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**

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15)
Parameter: Toluene input
Limit: The total input of toluene to the five (5) spray coating operations shall be less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	Toluene	Toluene	Toluene
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**

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15)
Parameter: Xylene input
Limit: The total input of xylene to the five (5) spray coating operations shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	Xylene	Xylene	Xylene
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**

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15)
Parameter: Methyl isobutyl ketone (MIBK) input
Limit: The total input of methyl isobutyl ketone (MIBK) to the five (5) spray coating operations shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	MIBK	MIBK	MIBK
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**

FESOP Quarterly Report
(Submit Report Quarterly)

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: Five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15)
Parameter: Total of any combination of HAPs input
Limit: The total input of any combination of HAPs to the five (5) spray coating operations shall be less than 24.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Total Input this Month (tons)	Total Input Previous 11 Months (tons)	Total 12-Month Input (tons)
	Total HAPs	Total HAPs	Total HAPs
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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Addendum to the Technical Support Document (ATSD) for a
Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Draper, Inc.
Source Location:	411 South Pearl Street, Spiceland, IN 47385
County:	Henry
SIC Code:	2591, 3861
Operation Permit No.:	F 065-24217-00029
Operation Permit Issuance Date:	April 7, 2008
Significant Permit Revision No.:	065-30553-00029
Permit Reviewer:	Jason R. Krawczyk

On July 1, 2011, the Office of Air Quality (OAQ) had a notice published in the Courier Times, New Castle, Indiana, stating that Draper, Inc. had applied for a Significant Permit Revision to their FESOP to add a polyurethane coating operation. The notice also stated that the OAQ proposed to issue a FESOP Significant Permit Revision for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO₂ equivalent emissions (CO₂e). Therefore, CO₂e emissions have been calculated for this source. Based on the calculations, the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO₂e per year (see ATSD Appendix A for detailed calculations).

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

...
C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) **and greenhouse gases (GHGs)**, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gasses (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) per twelve (12) consecutive month period.**

...

IDEM Contact

- (a) Questions regarding this proposed FESOP Significant Permit Revision 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 permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

SUMMARY OF EMISSIONS AFTER REVISION

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Pit ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: August 3, 2011

Uncontrolled / Unlimited Emissions (Tons/Yr)						
Pollutant	Natural Gas Combustion	Surface Coating	Polyurethane Coating Operations	Powder Coating	Welding	Total
PM	0.20	60.06	32.88	0.31	1.11	94.56
PM10	0.78	60.06	32.88	0.31	1.11	95.15
PM2.5	0.78	60.06	32.88	0.31	1.11	95.15
VOC	0.57	457.53	14.19	-	-	472.28
NOx	10.31	-	-	-	-	10.31
SO2	0.06	-	-	-	-	0.06
CO	8.66	-	-	-	-	8.66
CO2e	12,453	-	-	-	-	12,453
Single HAP (Toluene)	3.51E-04	149.92	-	-	-	149.92
Combined HAPs	0.19	319.81	-	-	0.10	320.11

Controlled / Unlimited Emissions (Tons/Yr)						
Pollutant	Natural Gas Combustion	Surface Coating	Polyurethane Coating Operations	Powder Coating	Welding	Total
PM	0.20	7.81	1.64	1.54E-04	1.11	10.76
PM10	0.78	7.81	1.64	1.54E-04	1.11	11.35
PM2.5	0.78	7.81	1.64	1.54E-04	1.11	11.35
VOC	0.57	457.53	14.19	-	-	472.28
NOx	10.31	-	-	-	-	10.31
SO2	0.06	-	-	-	-	0.06
CO	8.66	-	-	-	-	8.66
CO2e	12,453	-	-	-	-	12,453
Single HAP (Toluene)	3.507E-04	149.92	-	-	-	149.92
Combined HAPs	0.19	319.81	-	-	0.10	320.11

Limited / Uncontrolled Emissions (Tons/Yr)						
Pollutant	Natural Gas Combustion	Surface Coating	Polyurethane Coating Operations	Powder Coating	Welding	Total
PM	0.20	60.06	32.88	0.31	1.11	94.56
PM10	0.78	60.06	32.88	0.31	1.11	95.15
PM2.5	0.78	60.06	32.88	0.31	1.11	95.15
VOC	0.57	99.40	-	-	-	<100
NOx	10.31	-	-	-	-	10.31
SO2	0.06	-	-	-	-	0.06
CO	8.66	-	-	-	-	8.66
CO2e	12,453	-	-	-	-	12,453
Single HAP (Toluene)	3.51E-04	9.99	-	-	-	<10
Combined HAPs	0.19	24.52	-	-	0.10	<25

Note:

The coatings used in the polyurethane coating operations (EU15) currently do not contain any HAPs. EU15 will be limited under the existing HAP limits in the permit in order to allow the Permittee operational flexibility should they decide to switch to a HAP containing coating in the future.

SUMMARY OF EMISSIONS BEFORE REVISION

Company Name: Draper, Inc.
 Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
 Permit Number: 065-30553-00029
 Pit ID: 065-00029
 Reviewer: Jason R. Krawczyk
 Date: August 3, 2011

Uncontrolled / Unlimited Emissions (Tons/Yr)					
Pollutant	Natural Gas Combustion	Surface Coating	Powder Coating	Welding	Total
PM	0.20	60.06	0.31	1.11	61.68
PM10	0.78	60.06	0.31	1.11	62.27
PM2.5	0.78	60.06	0.31	1.11	62.27
VOC	0.57	457.53	-	-	458.10
NOx	10.31	-	-	-	10.31
SO2	0.06	-	-	-	0.06
CO	8.66	-	-	-	8.66
CO2e	12,453	-	-	-	12,453
Single HAP (Toluene)	3.51E-04	149.92	-	-	149.92
Combined HAPs	0.19	319.81	-	0.10	320.11

Controlled / Unlimited Emissions (Tons/Yr)					
Pollutant	Natural Gas Combustion	Surface Coating	Powder Coating	Welding	Total
PM	0.20	7.81	1.54E-04	1.11	9.12
PM10	0.78	7.81	1.54E-04	1.11	9.71
PM2.5	0.78	7.81	1.54E-04	1.11	9.71
VOC	0.57	457.53	-	-	458.10
NOx	10.31	-	-	-	10.31
SO2	0.06	-	-	-	0.06
CO	8.66	-	-	-	8.66
CO2e	12,453	-	-	-	12,453
Single HAP (Toluene)	3.507E-04	149.92	-	-	149.92
Combined HAPs	0.19	319.81	-	0.10	320.11

Limited / Uncontrolled Emissions (Tons/Yr)					
Pollutant	Natural Gas Combustion	Surface Coating	Powder Coating	Welding	Total
PM	0.20	60.06	0.31	1.11	61.68
PM10	0.78	60.06	0.31	1.11	62.27
PM2.5	0.78	60.06	0.31	1.11	62.27
VOC	0.57	99.40	-	-	<100
NOx	10.31	-	-	-	10.31
SO2	0.06	-	-	-	0.06
CO	8.66	-	-	-	8.66
CO2e	12,453	-	-	-	12,453
Single HAP (Toluene)	3.51E-04	9.99	-	-	<10
Combined HAPs	0.19	24.52	-	0.10	<25

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

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Plt ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: August 3, 2011

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Unit ID
1.00	8.76	One (1) natural gas-fired make-up unit, identified as EU1
0.80	7.01	One (1) natural gas-fired make-up unit, identified as EU3
0.80	7.01	One (1) natural gas-fired make-up unit, identified as EU5
1.00	8.76	One (1) natural gas-fired make-up unit, identified as EU7
0.80	7.01	One (1) natural gas-fired make-up unit, identified as EU9
0.80	7.01	One (1) natural gas-fired make-up unit, identified as EU11
11.90	104.24	Nine (9) natural gas-fired air rotation units
2.45	21.46	Twenty-one (21) natural gas-fired space heaters
4.00	35.04	One (1) natural gas-fired cure oven, identified as EU13
23.55	206.3	

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.20	0.78	0.06	10.31	0.57	8.66

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
HAPs Emissions**

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Plt ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: August 3, 2011

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.166E-04	1.238E-04	7.736E-03	1.857E-01	3.507E-04

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.157E-05	1.135E-04	1.444E-04	3.920E-05	2.166E-04

Combined HAPs: 0.19

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

See Page 3 for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Greenhouse Gas Emissions**

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Plt ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: August 3, 2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	12,378	0.24	0.23
Summed Potential Emissions in tons/yr	12,378		
CO2e Total in tons/yr	12,453		

Methodology

The N2O Emission Factor for uncontrolled is 2.2.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations
VOC, Particulate, and HAP
From Surface Coating Operations**

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Plt ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: August 3, 2011

Material	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	
IL-359-R2	7.60	79.00%	0.00%	79.0%	0.00%	14.87%	0.590	6.00	6.00	6.00	21.25	510.10	93.09	12.37	1.61	40.38	50%	87%	
IL-555	8.20	73.00%	0.00%	73.0%	0.00%	14.58%	0.040	3.00	5.99	5.99	0.72	17.24	3.15	0.58	0.08	41.06	50%	87%	
CPL-794	8.20	73.00%	0.00%	73.0%	0.00%	17.94%	0.040	3.00	5.99	5.99	0.72	17.24	3.15	0.58	0.08	33.37	50%	87%	
CPL-1443	8.20	71.00%	0.00%	71.0%	0.00%	18.40%	0.040	3.00	5.82	5.82	0.70	16.77	3.06	0.62	0.08	31.64	50%	87%	
CPL-276R1	9.10	78.00%	0.00%	78.0%	0.00%	20.90%	0.040	3.00	7.10	7.10	0.85	20.44	3.73	0.53	0.07	33.96	50%	87%	
CPL-176R1	8.20	72.00%	0.00%	72.0%	0.00%	14.33%	0.040	3.00	5.90	5.90	0.71	17.00	3.10	0.60	0.08	41.20	50%	87%	
418 Primer	7.10	46.00%	0.00%	46.0%	0.00%	5.00%	0.040	3.00	3.27	3.27	0.39	9.41	1.72	1.01	0.13	65.32	50%	87%	
IL-360	7.50	80.00%	0.00%	80.0%	0.00%	12.80%	0.070	60.00	6.00	6.00	25.20	604.80	110.38	13.80	1.79	46.88	50%	87%	
KPV-1415	7.20	82.00%	0.00%	82.0%	0.00%	16.50%	0.040	3.00	5.90	5.90	0.71	17.00	3.10	0.34	0.04	35.78	50%	87%	
IL-360	7.50	80.00%	0.00%	80.0%	0.00%	12.80%	0.070	60.00	6.00	6.00	25.20	604.80	110.38	13.80	1.79	46.88	50%	87%	
Lackersolv 370A	7.10	100.00%	0.00%	100.0%	0.00%	0.00%	0.018	1.00	7.10	7.10	0.13	3.07	0.56	0.00	0.00	N/A	50%	87%	
Lackersolv 370A	7.10	100.00%	0.00%	100.0%	0.00%	0.00%	0.012	1.00	7.10	7.10	0.09	2.04	0.37	0.00	0.00	N/A	50%	87%	
Flat Black	7.89	84.12%	23.90%	60.2%	24.10%	10.68%	0.020	60.00	6.26	4.75	5.70	136.84	24.97	3.95	0.51	44.49	40%	87%	
Border Paint	7.90	87.00%	0.00%	87.0%	0.00%	7.70%	0.063	10.00	6.87	6.87	4.33	103.92	18.97	1.70	0.22	89.26	40%	87%	
Black Lacquer	7.56	82.10%	0.00%	82.1%	0.00%	12.40%	0.477	6.00	6.21	6.21	17.76	426.33	77.81	10.18	1.32	50.05	40%	87%	
Total Potential to Emit:											104.46	2507.00	457.53	60.06	7.81				

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)
Uncontrolled Particulate Potential (tons/yr) = (gal/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Controlled Particulate Potential (tons/yr) = Uncontrolled Particulate Potential (tons/yr) * (1 - Particulate Control Efficiency)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % ethylhexyl)phthalate	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethyl- benzene Emissions (ton/yr)	Bis(2-ethylhexyl)- phthalate Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total HAP Emissions (ton/yr)	
IL-359-R2	7.60	0.590	6.00	5.27%	42.33%	0.00%	0.00%	0.00%	0.00%	6.21	49.88	0.00	0.00	0.00	0.00	56.09	
IL-555	8.20	0.040	3.00	3.87%	39.73%	10.53%	0.00%	0.00%	0.00%	0.17	1.71	0.45	0.00	0.00	0.00	2.33	
CPL-794	8.20	0.040	3.00	4.33%	39.40%	1.27%	0.00%	0.00%	0.00%	0.19	1.70	0.05	0.00	0.00	0.00	1.94	
CPL-1443	8.20	0.040	3.00	5.00%	39.33%	1.20%	0.00%	0.00%	0.00%	0.22	1.70	0.05	0.00	0.00	0.00	1.96	
CPL-276R1	9.10	0.040	3.00	3.07%	35.22%	2.41%	0.00%	0.00%	0.00%	0.15	1.68	0.12	0.00	0.00	0.00	1.95	
CPL-176R1	8.20	0.040	3.00	4.33%	40.20%	16.87%	0.00%	0.00%	0.00%	0.19	1.73	0.73	0.00	0.00	0.00	2.65	
418 Primer	7.10	0.040	3.00	0.00%	0.00%	12.30%	0.00%	0.00%	0.00%	0.00	0.00	0.46	0.00	0.00	0.00	0.46	
IL-360	7.50	0.070	60.00	0.00%	22.07%	46.93%	0.00%	0.00%	0.00%	0.00	30.45	64.75	0.00	0.00	0.00	95.20	
KPV-1415	7.20	0.040	3.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
IL-360	7.50	0.070	60.00	0.00%	22.07%	46.93%	0.00%	0.00%	0.00%	0.00	30.45	64.75	0.00	0.00	0.00	95.20	
Lackersolv 370A	7.10	0.018	1.00	0.00%	70.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.39	0.00	0.00	0.00	0.00	0.39	
Lackersolv 370A	7.10	0.012	1.00	0.00%	70.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.26	0.00	0.00	0.00	0.00	0.26	
Flat Black	7.89	0.020	60.00	16.00%	12.40%	0.00%	0.00%	0.00%	0.00%	6.64	5.14	0.00	0.00	0.00	0.00	11.78	
Border Paint	7.90	0.063	10.00	20.00%	20.00%	0.00%	5.00%	0.00%	1.00%	4.36	4.36	0.00	1.09	0.00	0.22	10.03	
Black Lacquer	7.56	0.477	6.00	17.94%	21.59%	0.00%	0.00%	2.23%	0.00%	17.00	20.46	0.00	0.00	2.11	0.00	39.51	
Total Potential to Emit:											35.11	149.92	131.36	1.09	2.11	0.22	319.81

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 One (1) Polyurethane Coating Operation

Company Name: Draper, Inc.
 Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
 Permit Number: 065-30553-00029
 Plt ID: 065-00029
 Reviewer: Jason R. Krawczyk
 Date: August 3, 2011

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max Coating Usage (gal/hr)	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
WPU Alum	8.76	68.86%	63.03%	5.83%	66.64%	27.23%	6.34	1.53	0.51	3.24	77.74	14.19	18.95	0.95	1.88	75%	95%
WPU Pearl	9.47	60.83%	55.53%	5.30%	63.78%	30.19%	5.87	1.39	0.50	2.94	70.67	12.90	23.83	1.19	1.66	75%	95%
WPU White	11.17	45.95%	41.19%	4.76%	55.71%	37.92%	4.97	1.20	0.53	2.64	63.47	11.58	32.88	1.64	1.40	75%	95%
Worst-Case Potential to Emit*:										3.24	77.74	14.19	32.88	1.64			

Note:
 Max Coating Usage based on test applicators (2 DEVILBISS HVLP Spray Guns) and Coat Surface (Application Rate of 3.5 grams/sec/gun)
 3.5 grams / second = 27.78 lb / hr x 2 = 55.56 lb/hr
 *Worst Case Potential to Emit = WPU Alum (VOC) and WPU White (Particulate)

Methodology:
 Max Coating Usage (gal/hr) = 55.56 lb/hr / Density (Lb/Gal)
 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) * Max Coating Usage (gal/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Max Coating Usage (gal/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Max Coating Usage (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Uncontrolled Particulate Potential (tons/yr) = (gal/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Controlled Particulate Potential (tons/yr) = Uncontrolled Particulate Potential (tons/yr) * (1 - Particulate Control Efficiency)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Appendix A: Emissions Calculations

VOC and Particulate
From Powder Coating Operations

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Pit ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: August 3, 2011

Booth I.D.	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds of Mat. (lb/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	
Powder Coat System #4	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.10000	0.940	0.00	0.00	0.00	0.00	0.00	0.10	5.15E-05	0.00	75%	99.95%	
Powder Coat System#7	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.10000	1.880	0.00	0.00	0.00	0.00	0.00	0.21	1.03E-04	0.00	75%	99.95%	
Total Potential to Emit:											0.00	0.00	0.00	0.31	1.54E-04				

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)

Uncontrolled Particulate Potential (tons/yr) = (gal/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Controlled Particulate Potential (tons/yr) = Uncontrolled Particulate Potential (tons/yr) * (1 - Particulate Control Efficiency)

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

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

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Pit ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: August 3, 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)	17	2.72	0.0055	0.0005			0.254	0.023	0.000	0	0.023
EMISSION TOTALS											
Potential Emissions lbs/hr							0.25				0.02
Potential Emissions lbs/day							6.10				0.55
Potential Emissions tons/year							1.11				0.10

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

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

Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location
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Source Name:	Draper, Inc.
Source Location:	411 South Pearl Street, Spiceland, IN 47385
County:	Henry
SIC Code:	2591, 3861
Operation Permit No.:	F 065-24217-00029
Operation Permit Issuance Date:	April 7, 2008
Significant Permit Revision No.:	065-30553-00029
Permit Reviewer:	Jason R. Krawczyk

On May 16, 2011, the Office of Air Quality (OAQ) received an application from Draper, Inc. related to a modification to an existing window coverings, projection screens, and gymnasium equipment manufacturing source.

Existing Approvals

The source was issued FESOP Renewal No. F065-24217-00029 on April 7, 2008. The source has since received the following approvals:

- (a) Administrative Amendment No. 065-27309-00029, issued on March 10, 2009; and
- (b) Significant Permit Revision No. 065-28477-00029, issued on January 6, 2010.

County Attainment Status

The source is located in Henry County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for 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. Henry 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}**
 Henry County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
 Henry County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.31	0.57	8.66	0.19	0.19 Hexane
Surface Coating Operation*	60.06	60.06	60.06	-	-	<99.40	-	<24.52	<9.99 Toluene
Powder Coating Operation	0.31	0.31	0.31	-	-	-	-	-	-
Welding Operation	1.11	1.11	1.11	-	-	-	-	0.10	0.10 Manganese
Total PTE of Entire Source	61.68	62.27	62.27	0.06	10.31	<100	8.66	<25	<10
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

negl. = negligible
 These emissions are based upon Significant Permit Revision F065-28477-00029, issued January 6, 2010.
 * Potential particulate emissions from the Surface Coating Operation represent uncontrolled / unlimited PTE.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Draper, Inc. on May 16, 2011, relating to the installation of a new polyurethane coating operation.

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

- (a) One (1) polyurethane coating operation, identified as EU15, approved for construction in 2011, performing HVLP coating through the use of two applicator guns, with a maximum coating capacity of 3.5 grams per second per coating gun, coating projection screens, using dry filters for particulate matter overspray control, and exhausting to one (1) vent, identified as V1.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Polyurethane Coating Operation (EU15)	32.88	32.88	32.88	-	-	14.19	-	-	-
Total PTE of Proposed Revision	32.88	32.88	32.88	-	-	14.19	-	-	-

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".

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(e)(i), because the revision involves the construction of a polyurethane coating operation (EU15) with potential to emit (PTE) PM and PM10 greater than 25 tons per year, each.

PTE of the Entire Source After Issuance of the FESOP Revision

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion	0.20	0.78	0.78	0.06	10.31	0.57	8.66	0.19	0.19 Hexane
Surface Coating Operation	60.06	60.06	60.06	-	-	<99.40	-	<24.52	<9.99 Toluene
Polyurethane Coating Operation (EU15)	32.88	32.88	32.88	-	-		-		
Powder Coating Operation	0.31	0.31	0.31	-	-	-	-	-	-
Welding Operation	1.11	1.11	1.11	-	-	-	-	0.10	0.10 Manganese
Total PTE of Entire Source	94.56	95.15	95.15	0.06	10.31	<100.00	8.66	<25.00	<10.00
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

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and render the requirements of 326 IAC 2-4.1 (MACT) not applicable, the source shall comply with the following:

- (1) The total input of VOC to the five (5) paint spray booths (EU4, EU8, EU10, EU12, and EU15) including but not limited to the input of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC emissions from the entire source to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70 Permits) not applicable.

- (2) The total input of toluene to the five (5) spray coating operations shall be less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (3) The total input of xylene to the five (5) spray coating operations shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (4) The total input of methyl isobutyl ketone (MIBK) to the five (5) spray coating operations shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (5) The total input of any combination of HAPs to the five (5) spray coating operations shall be less than 24.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit HAP from all other emission units at this source, shall limit HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for each single HAP and less than 25 tons per twelve (12) consecutive month period for any combination of HAPs, and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (MACT) not applicable.

Note: The coatings used in the polyurethane coating operations (EU15) currently do not contain any HAPs. EU15 will be limited under the existing HAP limits in the permit in order to allow the Permittee operational flexibility should they decide to switch to a HAP containing coating in the future.

- (b) **PSD Minor Source**
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF (326 IAC 12), are not included for this proposed revision, since EU15 does not perform rotogravure printing to print or coat flexible vinyl or urethane products. EU15 performs HVLP application of coating to flexible vinyl sheet.
- (b) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT (326 IAC 12), are not included for this proposed revision, since EU15 does not apply coatings to plastic parts for use in the manufacture of business machines, as business machines is defined in 40 CFR 60.721.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP (326 IAC 20-81), are not included for this proposed revision, since the source does not use 378 liters (100 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of plastic parts and products, and is not a major source, is not located at a major source, and is not part of a major source of emissions of HAP.
- (e) 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.

- (f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to 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 proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (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.

Polyurethane Coating Operation (EU15)

- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate emissions from the polyurethane coating operation identified as EU15 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.
- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The requirements of 326 IAC 8-1-6 are not applicable to the polyurethane coating operation, since the coating operation applies polyurethane coatings to polyvinyl chloride (PVC) screens and is subject to the requirements of 326 IAC 8-2-11 (Surface Coating Emission Limitations: Fabric and Vinyl Coating).
- (i) 326 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)
The requirements of 326 IAC 8-2-9 are not applicable to the polyurethane coating operation identified as EU15. Although EU15 applies a polyurethane coating to PVC, a thermoplastic polymer, PVC is also a vinyl polymer, and the polyurethane coating operation would therefore be subject to the requirements of 326 IAC 8-2-11 (Surface Coating Emission Limitations: Fabric and Vinyl Coating).
- (j) 326 IAC 8-2-11 (Surface Coating Emission Limitations: Fabric and Vinyl Coating)
Pursuant to 326 IAC 8-2-11(a), the polyurethane coating operation EU15 is subject to the requirements of 326 IAC 8-2-11 because it applies a functional, decorative, or protective topcoat or printing on vinyl coated fabric or vinyl sheets.

In order to comply with the requirements of 326 IAC 8-2-11(b), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 4.8 pounds of VOC per gallon of coating, excluding water, as delivered to the coating applicator from a vinyl coating line.

- (k) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 065-24217-00029, issued on April 7, 2008.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

...

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- ...
- (e) **One (1) polyurethane coating operation, identified as EU15, approved for construction in 2011, performing HVLP coating through the use of two applicator**

guns, with a maximum coating capacity of 3.5 grams per second per coating gun, coating projection screens, using dry filters for particulate matter overspray control, and exhausting to one (1) vent, identified as V1.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) paint spray booth, identified as EU4, constructed in 1995, utilizing an air atomization spray application system, coating a maximum of 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting at one (1) stack, identified as S2;
- (b) One (1) paint spray booth, identified as EU8, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 60 rigid projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S4;
- (c) One (1) paint spray booth, identified as EU10, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5; and
- (d) One (1) paint spray booth, identified as EU12, constructed in 2000, utilizing HVLP spray application system, coating a maximum of 6 wood cases, 3 metal light bloc frames, or 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.
- (e) **One (1) polyurethane coating operation, identified as EU15, approved for construction in 2011, performing HVLP coating through the use of two applicator guns, with a maximum coating capacity of 3.5 grams per second per coating gun, coating projection screens, using dry filters for particulate matter overspray control, and exhausting to one (1) vent, identified as V1.**

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

D.1.1 Volatile Organic Compounds (VOC) FESOP and PSD Minor Limit [326 IAC 2-8-4][326 IAC 2-2][326 IAC 8-2-12][326 IAC 8-2-11]

- (a) — The total input of VOC at ~~to the four (4)~~ **five (5)** ~~paint spray booths~~ **spray coating operations (EU4, EU8, EU10, EU12, and EU15)**, including but not limited to the input of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from other emission units at the source shall limit the VOC emissions from the entire source to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70 Permits) **and 326 IAC 2-2 (PSD)** not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12][326 IAC 8-2-11]

- (a)~~(b)~~ Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the four (4) paint spray booths **(EU4, EU8, EU10, and EU12)** shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application.

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (b)(e)** Pursuant to 326 IAC 8-2-11, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 4.8 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator from a vinyl coating line (**EU4, EU8, EU10, EU12, and EU15**) when coating vinyl.

D.1.23 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The total input of toluene ~~at to the four (4) paint spray booths~~ **five (5) spray coating operations** shall be less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total input of xylene ~~at to the four (4) paint spray booths~~ **five (5) spray coating operations** shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total input of methyl isobutyl ketone (MIBK) ~~at to the four (4) paint spray booths~~ **five (5) spray coating operations** shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The total input of any combination of HAPs ~~at to the four (4) paint spray booths~~ **five (5) spray coating operations** shall be less than 24.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit HAP from all other emission units at this source, shall limit HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for each single HAP and less than 25 tons per twelve (12) consecutive month period for any combination of HAPs, and render the requirements of 326 IAC 2-7 (Part 70 Permits) **and 326 IAC 2-4.1 (MACT)** not applicable.

D.1.34 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the ~~four (4) paint booths~~ **five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15)** 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.

...

D.1.56 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP input limitations contained in Conditions D.1.1, ~~and D.1.2(b),~~ **and D.1.3** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

...

D.1.67 VOC and HAP Emissions

Compliance with Conditions D.1.1, ~~and D.1.2(b),~~ **and D.1.3** shall be demonstrated ~~within no later than~~ **within no later than** 30 days of the end of each month based on the respective total volatile organic compound, and single HAP and total HAP input for the most recent twelve (12) month period.

...

- (b) IDEM, OAQ has decided to make additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.
1. Section A.1 of the permit and the reporting forms have been revised to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
 2. For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligations with regard to the records required by this condition."
 3. IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timelines have been switched to "no later than" or "not later than" except when the underlying rule states "within."
 4. IDEM has decided to clarify throughout the permit that a certification needs to meet the requirements of 326 IAC 2-8-5(a)(1). In addition, IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the conditions requiring the forms already addresses this issue.
 5. IDEM has decided to clarify the certification requirements in Section B - Duty to Provide Information and Section B - Certification.
 6. IDEM has decided to clarify the requirements of Section B – Preventive Maintenance Plan and to add a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans.
 7. IDEM has revised the language of the Section B - Preventive Maintenance Plan, Section C - Compliance Monitoring, Section C - General Record Keeping, and Section C - General Reporting to allow the Permittee to not have to begin implementing the requirements of these conditions until ninety days after initial start up.
 8. IDEM has revised Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.
 9. IDEM has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviations from Permit Requirements and Conditions and added the requirements of that condition to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the

report.

10. IDEM has revised Section B - Permit Renewal paragraph (c) to state which rule establishes the authority to set a deadline for the Permittee to submit additional information.
11. IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
12. IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
13. IDEM has revised the language of the Section C - Asbestos Abatement Projects to change the terminology "Accredited" to "Licensed" in order to match the rule.
14. IDEM has removed the first paragraph of Section C - Performance Testing as due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
15. IDEM has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been change to clearly indicate that it is the Permittee that must follow the requirements of the condition
16. IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
17. IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
18. IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
19. The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
20. IDEM has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.
21. The word "status" has been added to Section D - Record Keeping Requirements and Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status.

The wording has been revised to properly reflect this.

22. The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report Form to match the underlying rule.
23. The requirements of 326 IAC 6-2-4 have been removed from the permit for the natural gas-fired make-up units, air rotation units, space heaters, and cure oven. These units do not heat a process liquid or heat transfer media to transfer heat and are direct fired units. Therefore the requirements of 326 IAC 6-2-4 are not applicable.

...
A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary window coverings, projection screens and gymnasium equipment manufacturing source.

Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
Mailing Address: ~~411 South Pearl Street, Spiceland, Indiana 47385~~

...

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) six (6) natural gas fired make-up units, identified as EU1, rated at 1.0 MMBtu/hr; EU3, rated at 0.8 MMBtu/hr; EU5, rated at 0.8 MMBtu; EU7, rated at 1.0 MMBtu; EU9, rated at 0.8 MMBtu/hr; and EU 11, rated at 0.8 MMBtu/hr. The six (6) natural gas fired make-up units have a total heat input capacity of 5.2 million (MM) British thermal units (Btu) per hour.
- (b) nine (9) natural gas fired air rotation units, ~~each with a heat input capacity of equal to or less than 1.125 MMBtu. The total heat input capacity for the nine (9) natural gas fired air rotation units is of 11.9 million (MM) British thermal units (Btu) per hour~~ **MMBtu/hr.** [326 IAC 6-2-4]
- (c) twenty one (21) natural gas fired space heaters with a total heat input capacity of 2.45 MMBtu/hr ~~per hour~~ [326 IAC 6-2-4];
- (d) one (1) natural gas fired cure oven, identified as EU13, rated at 4.0 MMBtu/hr, and exhausting through stack S7 [326 IAC 6-2-4];

~~B.1 Definitions [326 IAC 2-8-1]~~

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

~~B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]~~

- ~~(a) This permit, F065-24217-00029, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.~~
- ~~(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.~~

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

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

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

~~B.4 — Enforceability [326 IAC 2-8-6]~~

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

~~B.5 — Severability [326 IAC 2-8-4(4)]~~

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

~~B.6 — Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]~~

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

~~B.7 — Duty to Provide Information [326 IAC 2-8-4(5)(E)]~~

- ~~(a) — The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.~~
- ~~(b) — For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

~~B.8 — Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]~~

- ~~(a) — Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~
- ~~(b) — One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~
- ~~(c) — An "authorized individual" is defined at 326 IAC 2-1.1-1(1).~~

~~B.9 — Annual Compliance Certification [326 IAC 2-8-5(a)(1)]~~

- ~~(a) — The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 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 46204-2254

- ~~(b) — The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- (c) The annual compliance certification report shall include the following:
- ~~(1) — The appropriate identification of each term or condition of this permit that is the basis of the certification;~~
 - ~~(2) — The compliance status;~~
 - ~~(3) — Whether compliance was continuous or intermittent;~~
 - ~~(4) — The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and~~
 - ~~(5) — Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.~~

~~The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~B.10 — Compliance Order Issuance [326 IAC 2-8-5(b)]~~

~~IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.~~

~~B.11 — Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]~~

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.~~
- (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 or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (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 Emergency Provisions [326 IAC 2-8-12]~~

- (a) ~~An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.~~
- (b) ~~An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:~~
- ~~(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;~~
 - ~~(2) The permitted facility was at the time being properly operated;~~
 - ~~(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;~~
 - ~~(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;~~

~~Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865~~
 - ~~(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:~~

~~Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

~~The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:~~
 - ~~(A) A description of the emergency;~~
 - ~~(B) Any steps taken to mitigate the emissions; and~~
 - ~~(C) Corrective actions taken.~~

~~The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(6) — The Permittee immediately took all reasonable steps to correct the emergency.~~
- ~~(c) — In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.~~
- ~~(d) — This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~
- ~~(e) — The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.~~
- ~~(f) — Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.~~
- ~~(g) — Operations may continue during an emergency only if the following conditions are met:~~
- ~~(1) — If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~
- ~~(2) — If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
- ~~(A) — The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
- ~~(B) — Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.~~
- ~~Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~
- ~~(h) — The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.~~

~~B.13 — Prior Permits Superseded [326 IAC 2-1.1-9.5]~~

- ~~(a) — All terms and conditions of permits established prior to F065-24217-00029 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]~~

~~The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.~~

~~B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]~~

~~(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported 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 46204-2254~~

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

~~B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]~~

~~(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:~~

~~(1) That this permit contains a material mistake.~~

~~(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.~~

~~(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]~~

~~(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]~~

- (d) ~~The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]~~

B.17 ~~Permit Renewal [326 IAC 2-8-3(h)]~~

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification 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 46204-2254~~

- (b) ~~A timely renewal application is one that is:~~
- (1) ~~Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~
- (2) ~~If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- (c) ~~If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 in writing by IDEM, OAQ any additional information identified as being needed to process the application.~~

B.18 ~~Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]~~

- (a) ~~Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 46204-2254~~

~~Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]~~

~~B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]~~

- ~~(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:~~

- ~~(1) The changes are not modifications under any provision of Title I of the Clean Air Act;~~
- ~~(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;~~
- ~~(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);~~
- ~~(4) The Permittee notifies the:~~

~~Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~and~~

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

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

- ~~(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.~~

~~Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).~~

- ~~(b) Emission Trades [326 IAC 2-8-15(c)]~~

~~The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).~~

- ~~(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]~~

~~The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.~~

- ~~(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~

~~B.20 Source Modification Requirement [326 IAC 2-8-11.1]~~

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

~~B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]~~

- ~~(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 46204-2254~~

~~The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]~~

~~B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]~~

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

~~B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]~~

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

~~...~~

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

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

~~C.2 Overall Source Limit [326 IAC 2-8]~~

~~The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.~~

- ~~(a) Pursuant to 326 IAC 2-8:
 - ~~(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.~~
 - ~~(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and~~
 - ~~(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.~~~~
- ~~(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.~~
- ~~(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.~~

~~(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.~~

~~C.3 Opacity [326 IAC 5-1]~~

~~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:~~

~~(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.~~

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

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

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

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

~~The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.~~

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

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

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

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

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

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

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

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(C) Waste disposal site.~~

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

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(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(e). 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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.~~

~~Testing Requirements [326 IAC 2-8-4(3)]~~

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

-
- ~~(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

~~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 46204-2254~~

~~no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.~~

~~Compliance Requirements [326 IAC 2-1.1-11]~~

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

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

~~Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]~~

~~C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]~~

~~Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

~~The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

~~C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]~~

~~Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.~~

~~C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]~~

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

~~Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]~~

~~C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]~~

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

~~C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]~~

- ~~(a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.~~
- ~~(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - ~~(1) initial inspection and evaluation;~~
 - ~~(2) recording that operations returned 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 within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~~~
- ~~(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 maintain the following records:
 - ~~(1) monitoring data;~~
 - ~~(2) monitor performance data, if applicable; and~~~~

~~(3) — corrective actions taken.~~

~~C.15 — Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]~~

- ~~(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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~
- ~~(b) — A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.~~
- ~~(c) — IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.~~

~~The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]~~

~~C.16 — General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]~~

- ~~(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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.~~

~~C.17 — General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]~~

- ~~(a) — The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(b) — The report required in (a) of this condition and 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~~

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

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

- ~~(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.~~

Stratospheric Ozone Protection

~~C.18 Compliance with 40 CFR 82 and 326 IAC 22-1~~

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

- ~~(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- ~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~
- ~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

...

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F065-24217-00029, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.**
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.**

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

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F065-24217-00029 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (4) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months

prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) **Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

...

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

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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.14 Actions Related to Noncompliance Demonstrated by a Stack Test
[326 IAC 2-8-4][326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

...

D.1.45 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the spray paint facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

...

D.1.78 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S2, S4, S5, and S6 and V1) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. in accordance with Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to responses steps required by this condition. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. in accordance with Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to responses steps required by this condition. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

...

D.1.89 Record Keeping Requirements

- (a) To document **the compliance status** with Conditions D.1.1, ~~and D.1.2(b), and D.1.3~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Conditions D.1.1 and D.1.2.
- ...
- (b) To document **the compliance status** with Conditions ~~D.1.7 and D.1.8~~, the Permittee shall maintain a log of daily filter inspections, weekly overspray observations, once per day and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the recordkeeping requirements of this requirement.**

D.1.910 Reporting Requirements

A quarterly summary of the information to document **the compliance status** with Conditions D.1.1, ~~and D.1.2(b), and D.1.3~~ shall be submitted to the address listed in ~~Section C - General Reporting Requirements, of this permit~~, using the reporting forms located at the end of this permit, or their equivalent, ~~within no later than~~ thirty (30) days after the end of the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "Aauthorized individual" as defined by 326 IAC 2-1.1-1(1).

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - Insignificant Activities:

- ...
- (b) nine (9) natural gas fired air rotation units, ~~each with a heat input capacity of equal to or less than 1.125 MMBtu. The total heat input capacity for the nine (9) natural gas fired air rotation units is of 11.9 million (MM) British thermal units (Btu) per hour~~ **MMBtu/hr. [326 IAC 6-2-4]**
- (c) twenty one (21) natural gas fired space heaters with a total heat input capacity of 2.45 MMBtu/hr ~~per hour~~ **[326 IAC 6-2-4];**
- (d) one (1) natural gas fired cure oven, identified as EU13, rated at 4.0 MMBtu/hr, and exhausting through stack S7 ~~[326 IAC 6-2-4];~~
- ...

...

~~D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]~~

~~Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-4(d)), the particulate matter (PM) from a facility with a source maximum operating capacity of less than 10 MMBtu/hr shall not exceed 0.6 lb/MMBtu. PM emissions from the insignificant activities, including the six (6) natural gas fired make-up units, the nine (9) natural gas fired air rotation units, the twenty one (21) natural gas fired space heaters, and the one (1) natural gas fired cure oven, identified as EU13, shall be limited to 0.60 pounds of particulate matter emitted per million Btu~~

~~heat input when the total source maximum operating capacity is less than 10 MMBtu/hr.~~

~~The following calculation was used to calculate total allowable emissions for each facility:~~

$$\left(\frac{\text{MMBtu}}{\text{hr}} \right) \left(\frac{0.60\text{lb}}{\text{MMBtu}} \right) \left(\frac{8760\text{hrs}}{\text{year}} \right) \left(\frac{\text{tons}}{2000\text{lb}} \right)$$

...

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
~~Mailing Address: 411 South Pearl Street, Spiceland, IN 47385~~
FESOP Permit No.: F065-24217-00029

...

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
~~Mailing Address: 411 South Pearl Street, Spiceland, IN 47385~~
FESOP Permit No.: F065-24217-00029

...

A certification is not required for this report.

...

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
~~Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385~~
FESOP Permit No.: F065-24217-00029
Facility: ~~Four (4) paint spray booths~~ **Five (5) spray coating operations (EU4, EU8, EU10, and EU12, and EU15)**
Parameter: VOC inputs
Limit: ~~Total VOC input at the four (4) paint spray booths, including but not limited to the input of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners, and VOC solvents, shall be limited to less than 99.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month~~ **The total input of VOC to the five (5) spray coating operations (EU4, EU8, EU10, EU12, and EU15), including but not limited to the input of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

...

~~Attach a signed certification to complete this report.~~

...

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
~~Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385~~
FESOP Permit No.: F065-24217-00029
Facility: ~~Four (4) paint spray booths~~ **Five (5) spray coating operations (EU4, EU8, EU10, and EU12, and EU15)**
Parameter: Toluene input
Limit: ~~Total Toluene input at the four (4) paint spray booths shall be limited to less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month~~ **The total input of toluene to the five (5) spray coating operations shall be less than 9.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

...

~~Attach a signed certification to complete this report.~~

...

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
~~Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385~~
FESOP Permit No.: F065-24217-00029
Facility: ~~Four (4) paint spray booths~~ **Five (5) spray coating operations** (EU4, EU8, EU10, and EU12, and **EU15**)
Parameter: Xylene input
Limit: ~~Total Xylene input at the four (4) paint spray booths shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month~~ **The total input of xylene to the five (5) spray coating operations shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

...

~~Attach a signed certification to complete this report.~~

...

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
FESOP Permit No.: F065-24217-00029
Facility: ~~Four (4) paint spray booths~~ **Five (5) spray coating operations** (EU4, EU8, EU10, and EU12, and **EU15**)
Parameter: Methyl isobutyl ketone (MIBK) input
Limit: ~~Total methyl isobutyl ketone (MIBK) input at the four (4) paint spray booths shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month~~ **The total input of methyl isobutyl ketone (MIBK) to the five (5) spray coating operations shall be less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

...

~~Attach a signed certification to complete this report.~~

...

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
~~Mailing Address: 411 South Pearl Street, Spiceland, Indiana 47385~~
FESOP Permit No.: F065-24217-00029
Facility: ~~Four (4) paint spray booths~~ **Five (5) spray coating operations** (EU4, EU8, EU10, and EU12, and **EU15**)
Parameter: Total of any combination of HAPs input
Limit: ~~Total or any combination of HAPs input at the four (4) paint spray booths shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month~~ **The total input of any combination of HAPs to the five (5) spray coating operations shall be less than 24.52 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

...

~~Attach a signed certification to complete this report.~~

...

Source Name: Draper, Inc.
Source Address: 411 South Pearl Street, Spiceland, Indiana 47385
~~Mailing Address: 411 South Pearl Street, Spiceland, IN 47385~~
FESOP Permit No.: F065-24217-00029

...

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements **of this permit**, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

...

~~Attach a signed certification to complete this report.~~

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 May 16, 2011.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. F065-30553-00029. The staff recommends to the Commissioner that this FESOP Significant Revision 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 AFTER REVISION

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Pit ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: June 23, 2011

Uncontrolled / Unlimited Emissions (Tons/Yr)						
Pollutant	Natural Gas Combustion	Surface Coating	Polyurethane Coating Operations	Powder Coating	Welding	Total
PM	0.20	60.06	32.88	0.31	1.11	94.56
PM10	0.78	60.06	32.88	0.31	1.11	95.15
PM2.5	0.78	60.06	32.88	0.31	1.11	95.15
VOC	0.57	457.53	14.19	-	-	472.28
NOx	10.31	-	-	-	-	10.31
SO2	0.06	-	-	-	-	0.06
CO	8.66	-	-	-	-	8.66
Single HAP (Toluene)	3.51E-04	149.92	-	-	-	149.92
Combined HAPs	0.19	319.81	-	-	0.10	320.11

Controlled / Unlimited Emissions (Tons/Yr)						
Pollutant	Natural Gas Combustion	Surface Coating	Polyurethane Coating Operations	Powder Coating	Welding	Total
PM	0.20	7.81	1.64	1.54E-04	1.11	10.76
PM10	0.78	7.81	1.64	1.54E-04	1.11	11.35
PM2.5	0.78	7.81	1.64	1.54E-04	1.11	11.35
VOC	0.57	457.53	14.19	-	-	472.28
NOx	10.31	-	-	-	-	10.31
SO2	0.06	-	-	-	-	0.06
CO	8.66	-	-	-	-	8.66
Single HAP (Toluene)	3.507E-04	149.92	-	-	-	149.92
Combined HAPs	0.19	319.81	-	-	0.10	320.11

Limited / Uncontrolled Emissions (Tons/Yr)						
Pollutant	Natural Gas Combustion	Surface Coating	Polyurethane Coating Operations	Powder Coating	Welding	Total
PM	0.20	60.06	32.88	0.31	1.11	94.56
PM10	0.78	60.06	32.88	0.31	1.11	95.15
PM2.5	0.78	60.06	32.88	0.31	1.11	95.15
VOC	0.57	99.40	-	-	-	<100
NOx	10.31	-	-	-	-	10.31
SO2	0.06	-	-	-	-	0.06
CO	8.66	-	-	-	-	8.66
Single HAP (Toluene)	3.51E-04	9.99	-	-	-	<10
Combined HAPs	0.19	24.52	-	-	0.10	<25

Note:

The coatings used in the polyurethane coating operations (EU15) currently do not contain any HAPs. EU15 will be limited under the existing HAP limits in the permit in order to allow the Permittee operational flexibility should they decide to switch to a HAP containing coating in the future.

SUMMARY OF EMISSIONS BEFORE REVISION

Company Name: Draper, Inc.
 Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
 Permit Number: 065-30553-00029
 Plt ID: 065-00029
 Reviewer: Jason R. Krawczyk
 Date: June 23, 2011

Uncontrolled / Unlimited Emissions (Tons/Yr)					
Pollutant	Natural Gas Combustion	Surface Coating	Powder Coating	Welding	Total
PM	0.20	60.06	0.31	1.11	61.68
PM10	0.78	60.06	0.31	1.11	62.27
PM2.5	0.78	60.06	0.31	1.11	62.27
VOC	0.57	457.53	-	-	458.10
NOx	10.31	-	-	-	10.31
SO2	0.06	-	-	-	0.06
CO	8.66	-	-	-	8.66
Single HAP (Toluene)	3.51E-04	149.92	-	-	149.92
Combined HAPs	0.19	319.81	-	0.10	320.11

Controlled / Unlimited Emissions (Tons/Yr)					
Pollutant	Natural Gas Combustion	Surface Coating	Powder Coating	Welding	Total
PM	0.20	7.81	1.54E-04	1.11	9.12
PM10	0.78	7.81	1.54E-04	1.11	9.71
PM2.5	0.78	7.81	1.54E-04	1.11	9.71
VOC	0.57	457.53	-	-	458.10
NOx	10.31	-	-	-	10.31
SO2	0.06	-	-	-	0.06
CO	8.66	-	-	-	8.66
Single HAP (Toluene)	3.507E-04	149.92	-	-	149.92
Combined HAPs	0.19	319.81	-	0.10	320.11

Limited / Uncontrolled Emissions (Tons/Yr)					
Pollutant	Natural Gas Combustion	Surface Coating	Powder Coating	Welding	Total
PM	0.20	60.06	0.31	1.11	61.68
PM10	0.78	60.06	0.31	1.11	62.27
PM2.5	0.78	60.06	0.31	1.11	62.27
VOC	0.57	99.40	-	-	<100
NOx	10.31	-	-	-	10.31
SO2	0.06	-	-	-	0.06
CO	8.66	-	-	-	8.66
Single HAP (Toluene)	3.51E-04	9.99	-	-	<10
Combined HAPs	0.19	24.52	-	0.10	<25

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

**Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Pit ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: June 23, 2011**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Unit ID
1.00	8.76	One (1) natural gas-fired make-up unit, identified as EU1
0.80	7.01	One (1) natural gas-fired make-up unit, identified as EU3
0.80	7.01	One (1) natural gas-fired make-up unit, identified as EU5
1.00	8.76	One (1) natural gas-fired make-up unit, identified as EU7
0.80	7.01	One (1) natural gas-fired make-up unit, identified as EU9
0.80	7.01	One (1) natural gas-fired make-up unit, identified as EU11
11.90	104.24	Nine (9) natural gas-fired air rotation units
2.45	21.46	Twenty-one (21) natural gas-fired space heaters
4.00	35.04	One (1) natural gas-fired cure oven, identified as EU13
23.55	206.30	

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.20	0.78	0.06	10.31	0.57	8.66

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 assumed equal to PM10.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology:

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.166E-04	1.238E-04	7.736E-03	1.857E-01	3.507E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.157E-05	1.135E-04	1.444E-04	3.920E-05	2.166E-04

Total HAPs: 0.19

Methodology is the same as above.

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, Particulate, and HAP
From Surface Coating Operations**

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Plt ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: June 23, 2011

Material	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	
IL-359-R2	7.60	79.00%	0.00%	79.0%	0.00%	14.87%	0.590	6.00	6.00	6.00	21.25	510.10	93.09	12.37	1.61	40.38	50%	87%	
IL-555	8.20	73.00%	0.00%	73.0%	0.00%	14.58%	0.040	3.00	5.99	5.99	0.72	17.24	3.15	0.58	0.08	41.06	50%	87%	
CPL-794	8.20	73.00%	0.00%	73.0%	0.00%	17.94%	0.040	3.00	5.99	5.99	0.72	17.24	3.15	0.58	0.08	33.37	50%	87%	
CPL-1443	8.20	71.00%	0.00%	71.0%	0.00%	18.40%	0.040	3.00	5.82	5.82	0.70	16.77	3.06	0.62	0.08	31.64	50%	87%	
CPL-276R1	9.10	78.00%	0.00%	78.0%	0.00%	20.90%	0.040	3.00	7.10	7.10	0.85	20.44	3.73	0.53	0.07	33.96	50%	87%	
CPL-176R1	8.20	72.00%	0.00%	72.0%	0.00%	14.33%	0.040	3.00	5.90	5.90	0.71	17.00	3.10	0.60	0.08	41.20	50%	87%	
418 Primer	7.10	46.00%	0.00%	46.0%	0.00%	5.00%	0.040	3.00	3.27	3.27	0.39	9.41	1.72	1.01	0.13	65.32	50%	87%	
IL-360	7.50	80.00%	0.00%	80.0%	0.00%	12.80%	0.070	60.00	6.00	6.00	25.20	604.80	110.38	13.80	1.79	46.88	50%	87%	
KPV-1415	7.20	82.00%	0.00%	82.0%	0.00%	16.50%	0.040	3.00	5.90	5.90	0.71	17.00	3.10	0.34	0.04	35.78	50%	87%	
IL-360	7.50	80.00%	0.00%	80.0%	0.00%	12.80%	0.070	60.00	6.00	6.00	25.20	604.80	110.38	13.80	1.79	46.88	50%	87%	
Lackersolv 370A	7.10	100.00%	0.00%	100.0%	0.00%	0.00%	0.018	1.00	7.10	7.10	0.13	3.07	0.56	0.00	0.00	N/A	50%	87%	
Lackersolv 370A	7.10	100.00%	0.00%	100.0%	0.00%	0.00%	0.012	1.00	7.10	7.10	0.09	2.04	0.37	0.00	0.00	N/A	50%	87%	
Flat Black	7.89	84.12%	23.90%	60.2%	24.10%	10.68%	0.020	60.00	6.26	4.75	5.70	136.84	24.97	3.95	0.51	44.49	40%	87%	
Border Paint	7.90	87.00%	0.00%	87.0%	0.00%	7.70%	0.063	10.00	6.87	6.87	4.33	103.92	18.97	1.70	0.22	89.26	40%	87%	
Black Lacquer	7.56	82.10%	0.00%	82.1%	0.00%	12.40%	0.477	6.00	6.21	6.21	17.76	426.33	77.81	10.18	1.32	50.05	40%	87%	
Total Potential to Emit:											104.46	2507.00	457.53	60.06	7.81				

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)
Uncontrolled Particulate Potential (tons/yr) = (gal/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Controlled Particulate Potential (tons/yr) = Uncontrolled Particulate Potential (tons/yr) * (1 - Particulate Control Efficiency)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % ethylhexyl)phthalate	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethyl- benzene Emissions (ton/yr)	Bis(2-ethylhexyl)- phthalate Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total HAP Emissions (ton/yr)		
IL-359-R2	7.60	0.590	6.00	5.27%	42.33%	0.00%	0.00%	0.00%	0.00%	6.21	49.88	0.00	0.00	0.00	0.00	56.09		
IL-555	8.20	0.040	3.00	3.87%	39.73%	10.53%	0.00%	0.00%	0.00%	0.17	1.71	0.45	0.00	0.00	0.00	2.33		
CPL-794	8.20	0.040	3.00	4.33%	39.40%	1.27%	0.00%	0.00%	0.00%	0.19	1.70	0.05	0.00	0.00	0.00	1.94		
CPL-1443	8.20	0.040	3.00	5.00%	39.33%	1.20%	0.00%	0.00%	0.00%	0.22	1.70	0.05	0.00	0.00	0.00	1.96		
CPL-276R1	9.10	0.040	3.00	3.07%	35.22%	2.41%	0.00%	0.00%	0.00%	0.15	1.68	0.12	0.00	0.00	0.00	1.95		
CPL-176R1	8.20	0.040	3.00	4.33%	40.20%	16.87%	0.00%	0.00%	0.00%	0.19	1.73	0.73	0.00	0.00	0.00	2.65		
418 Primer	7.10	0.040	3.00	0.00%	0.00%	12.30%	0.00%	0.00%	0.00%	0.00	0.00	0.46	0.00	0.00	0.00	0.46		
IL-360	7.50	0.070	60.00	0.00%	22.07%	46.93%	0.00%	0.00%	0.00%	0.00	30.45	64.75	0.00	0.00	0.00	95.20		
KPV-1415	7.20	0.040	3.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
IL-360	7.50	0.070	60.00	0.00%	22.07%	46.93%	0.00%	0.00%	0.00%	0.00	30.45	64.75	0.00	0.00	0.00	95.20		
Lackersolv 370A	7.10	0.018	1.00	0.00%	70.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.39	0.00	0.00	0.00	0.00	0.39		
Lackersolv 370A	7.10	0.012	1.00	0.00%	70.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.26	0.00	0.00	0.00	0.00	0.26		
Flat Black	7.89	0.020	60.00	16.00%	12.40%	0.00%	0.00%	0.00%	0.00%	6.64	5.14	0.00	0.00	0.00	0.00	11.78		
Border Paint	7.90	0.063	10.00	20.00%	20.00%	0.00%	5.00%	0.00%	1.00%	4.36	4.36	0.00	1.09	0.00	0.22	10.03		
Black Lacquer	7.56	0.477	6.00	17.94%	21.59%	0.00%	0.00%	2.23%	0.00%	17.00	20.46	0.00	0.00	2.11	0.00	39.58		
Total Potential to Emit:												35.11	149.92	131.36	1.09	2.11	0.22	319.81

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

VOC and Particulate

From One (1) Polyurethane Coating Operation

Company Name: Draper, Inc.

Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385

Permit Number: 065-30553-00029

Plt ID: 065-00029

Reviewer: Jason R. Krawczyk

Date: June 23, 2011

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max Coating Usage (gal/hr)	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
WPU Alum	8.76	68.86%	63.03%	5.83%	66.64%	27.23%	6.34	1.53	0.51	3.24	77.74	14.19	18.95	0.95	1.88	75%	95%
WPU Pearl	9.47	60.83%	55.53%	5.30%	63.78%	30.19%	5.87	1.39	0.50	2.94	70.67	12.90	23.83	1.19	1.66	75%	95%
WPU White	11.17	45.95%	41.19%	4.76%	55.71%	37.92%	4.97	1.20	0.53	2.64	63.47	11.58	32.88	1.64	1.40	75%	95%
Worst-Case Potential to Emit*:										3.24	77.74	14.19	32.88	1.64			

Note:

Max Coating Usage based on test applicators (2 DEVILBISS HVLP Spray Guns) and Coat Surface (Application Rate of 3.5 grams/sec/gun)

3.5 grams / second = 27.78 lb / hr x 2 = 55.56 lb/hr

*Worst Case Potential to Emit = WPU Alum (VOC) and WPU White (Particulate)

Methodology:

Max Coating Usage (gal/hr) = 55.56 lb/hr / Density (Lb/Gal)

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) * Max Coating Usage (gal/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Max Coating Usage (gal/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Max Coating Usage (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Uncontrolled Particulate Potential (tons/yr) = (gal/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Controlled Particulate Potential (tons/yr) = Uncontrolled Particulate Potential (tons/yr) * (1 - Particulate Control Efficiency)

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

Appendix A: Emissions Calculations

VOC and Particulate
From Powder Coating Operations

Company Name: Draper, Inc.
 Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
 Permit Number: 065-30553-00029
 Pit ID: 065-00029
 Reviewer: Jason R. Krawczyk
 Date: June 23, 2011

Booth I.D.	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds of Mat. (lb/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	
Powder Coat System #4	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.10000	0.940	0.00	0.00	0.00	0.00	0.00	0.10	5.15E-05	0.00	75%	99.95%	
Powder Coat System#7	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.10000	1.880	0.00	0.00	0.00	0.00	0.00	0.21	1.03E-04	0.00	75%	99.95%	
Total Potential to Emit:											0.00	0.00	0.00	0.31	1.54E-04				

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)

Uncontrolled Particulate Potential (tons/yr) = (gal/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Controlled Particulate Potential (tons/yr) = Uncontrolled Particulate Potential (tons/yr) * (1 - Particulate Control Efficiency)

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

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

Company Name: Draper, Inc.
Address City IN Zip: 411 South Pearl Street, Spiceland, IN 47385
Permit Number: 065-30553-00029
Pit ID: 065-00029
Reviewer: Jason R. Krawczyk
Date: June 23, 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)	17	2.72	0.0055	0.0005			0.254	0.023	0.000	0	0.023
EMISSION TOTALS											
Potential Emissions lbs/hr							0.25				0.02
Potential Emissions lbs/day							6.10				0.55
Potential Emissions tons/year							1.11				0.10

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.



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: Charles Baker
Draper, Inc.
411 S Pearl St
Spiceland, IN 47385-0425

DATE: August 3, 2011

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

SUBJECT: Final Decision
FESOP
065-30553-00029

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

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

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

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor

Thomas W. Easterly
Commissioner

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

August 3, 2011

TO: Spice land Public Library

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

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

Applicant Name: Draper, Inc.
Permit Number: 065-30553-00029

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

TO: Interested Parties / Applicant

DATE: August 3, 2011

RE: Draper, Inc. / 065-30553-00029

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

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Please Note: *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV.*

Enclosures
CD Memo.dot 11/14/08

Mail Code 61-53

IDEM Staff	CDENNY 8/3/2011 Draper, Inc. 065-30553-00029 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Charles Baker Draper, Inc. 411 S Pearl St Spiceland IN 47385-0425 (Source CAATS)										
2		Michael Broome VP Manufacturing Draper, Inc. 411 S Pearl St Spiceland IN 47385-0425 (RO CAATS)										
3		Lisa & Joe Hillman 2460 West 650 North Middletown IN 47356 (Affected Party)										
4		Mr. Stults 5363 W 300 N Middletown IN 47356 (Affected Party)										
5		Linda K. Bentele & Thom Horton & Brigham Robbins 8924 W. 550 N. Middletown IN 47356 (Affected Party)										
6		Ms. Nancy Fischer 5587 N 400 W Middletown IN 47356 (Affected Party)										
7		Beth & James Solomon 3888 W. 850 N. Middletown IN 47356 (Affected Party)										
8		Maynard & Mary Powell 130 N 6th St Middletown IN 47356 (Affected Party)										
9		Ms. Kim Bond 5261 N. CR 850 W. Middletown IN 47356 (Affected Party)										
10		John & Carolyn Hinton 4767 N. 450 W Middletown IN 47356 (Affected Party)										
11		Mr. & Mrs. Sam Todd 4351 N. CR 575 W. Middletown IN 47356 (Affected Party)										
12		Ferrell 2528 N. CR 500 W. Middletown IN 47356 (Affected Party)										
13		Mr & Mrs. Jim Minnick 144 N. 7th Street Middletown IN 47356 (Affected Party)										
14		Mr. Don Shaw 3322 W 400 N Middletown IN 47356 (Affected Party)										
15		Frank & Jeff McCrocklin 683 N 8th St Middletown IN 47356 (Affected Party)										

Total number of pieces Listed by Sender	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		Eunice & Barb 6047 N CR 850 W Middletown IN 47356 (Affected Party)										
2		Mr. John Shay 9294 W CR 950 N Middletown IN 47356 (Affected Party)										
3		Mrs. Beverly Price 8206 N Raider Rd Middletown IN 47356 (Affected Party)										
4		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 (Affected Party)										
5		Mr. Ronnie Sowers 818 North 500 West New Castle IN 47362 (Affected Party)										
6		Marilyn & Vernon Cherrett 712 North 500 West New Castle IN 47362 (Affected Party)										
7		Don Miller 3632 W. CR 100 S New Castle IN 47362 (Affected Party)										
8		Andrew Clark 735 N. 25th Street New Castle IN 47362 (Affected Party)										
9		Jeffrey & Debbie Powell 120 N 600 W New Castle IN 47362 (Affected Party)										
10		Mary & Mark Pierce 1512 N 425 W New Castle IN 47362 (Affected Party)										
11		Cronk & McCraine Residence 1441 W. CR 100 South New Castle IN 47362 (Affected Party)										
12		Mr. Troy Howell 1354 Cadiz Pk New Castle IN 47362 (Affected Party)										
13		Mr. & Mrs. Raymond Roseman 2645 S. Greensboro Pike New Castle IN 47362 (Affected Party)										
14		Mr. James Smith 4808 W SR 234 New Castle IN 47362 (Affected Party)										
15		Violet Wells 3828 West Street, Road 38 New Castle IN 47362 (Affected Party)										

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1		Jack & Walter 4199 US 36 East New Castle IN 47362 (Affected Party)										
2		Mr. & Mrs. Hersel Ankrom 903 Lincoln Avenue New Castle IN 47362 (Affected Party)										
3		Gerald & Roberta Haynes 2625 N CR 650 W New Castle IN 47362 (Affected Party)										
4		Mr. Stanley Richards 7220 W SR 38 New Castle IN 47362 (Affected Party)										
5		Mrs. Joyce Thompson 6663 E CR 2005 New Castle IN 47362 (Affected Party)										
6		Rose & Thomas Kramer 137 N CR 500 W New Castle IN 47362 (Affected Party)										
7		Henry County Board of Commissioners 101 S. Main St New Castle IN 47362 (Local Official)										
8		Mr. Jay Cory 478 N. Clover Drive New Castle IN 47362 (Affected Party)										
9		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)										
10		Robert Harris 6110 W. 100 S. Shirley IN 47384 (Affected Party)										
11		Spiceland Town Township 106 W Main St Spiceland IN 47385 (Library)										
12		Marsha & David Gratner P.O. Box 8 Sulphur Springs IN 47388 (Affected Party)										
13		Katherine & Stephen Fox PO Box 300 Shirley IN 47384 (Affected Party)										
14		Louis Crowe 3725 S. Memoria Drive New Castle IN 47362 (Affected Party)										
15		Belinda & Jeff Goble 5562 W. CR 100 N. New Castle IN 47362 (Affected Party)										

Total number of pieces Listed by Sender	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		Ron 3079 N. CR 650 W New Castle IN 47362 (Affected Party)										
2		Spiceland Town Council and Town Manager 130 E. Main St. Spiceland IN 47385 (Local Official)										
3		Henry County Health Department 1201 Race Street, Suite 208 New Castle IN 47362-4653 (Health Department)										
4		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												

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