



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: August 29, 2011

RE: Easton Tru-Flite LLC / 181-30691-00024

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

## Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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August 29, 2011

Mr. John Gooding  
Easton Tru-Flite, LLC  
2709 S. Freeman Road  
Monticello, IN 47960

Re: Exempt Construction and Operation Status,  
E181-30691-00024

Dear Mr. John Gooding:

The application from Easton Tru-Flite, LLC, received on July 8, 2011, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary arrow shaft preparation and fletching plant located at 2709 S. Freeman Road, Monticello, IN 47960 is classified as exempt from air pollution permit requirements:

- (a) One (1) arrow shaft preparation and cutting operation, constructed in 1938, with a maximum production capacity of 4,500 arrows per hour, with particulate emissions controlled by two (2) cyclone dust collectors, identified as DC-1 and DC-2, installed in 1990, and exhausting to stacks DC-1V and DC-2V, respectively.
- (b) One (1) arrow gluing, assembly, and lacquering operation, constructed in 1938, with a maximum production capacity of 4,500 arrows per hour, exhausting to the indoors or through stacks DC-1V and DC-2V. Adhesive is applied to the arrow shafts and components using needle/bead application. Lacquer is applied to the arrow shafts using dip coating in a lacquer bath.
- (c) One (1) wash buff operation, constructed in 1938, with a maximum production capacity of 4,500 arrows per hour, with negligible emissions of air pollutants.
- (c) One (1) fletching operation, constructed in 1938, consisting of gluing of fletching onto arrow shafts, using spray needle application of adhesive onto arrow shafts, with a maximum production capacity of 4,500 arrows per hour, exhausting to the indoors.
- (d) Paved roads and parking lots with public access.

The following conditions shall be applicable:

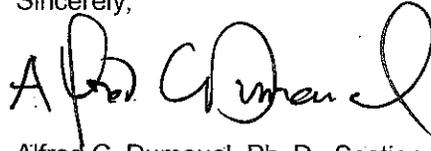
1. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
2. Pursuant to 326 IAC 5-1-2 (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.

A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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](http://www.idem.in.gov)

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Nathan Bell, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-233-5670 or at 1-800-451-6027 (ext 35670).

Sincerely,



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

ACD/ncb

cc: File - White County  
White County Health Department  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for an Exemption

### Source Description and Location

**Source Name:** Easton Tru-Flite, LLC  
**Source Location:** 2709 S. Freeman Road, Monticello, IN 47960  
**County:** White  
**SIC Code:** 3949  
**Registration No.:** E181-30691-00024  
**Permit Reviewer:** Nathan C. Bell

On July 8, 2011, the Office of Air Quality (OAQ) has received an application from Easton Tru-Flite, LLC related to the continued operation of their stationary arrow shaft preparation and fletching plant.

### Existing Approvals

The source has been operating under Registered Construction and Operation Status, CP No. 181-2676-00024, issued on June 7, 1993.

### County Attainment Status

The source is located in White County.

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

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.  
Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. White County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>  
White County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

#### **Fugitive Emissions**

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

#### **Background and Description of Emission Units and Pollution Control Equipment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Easton Tru-Flite, LLC relating to the continued operation of their stationary arrow shaft preparation and fletching plant.

The source consists of the following existing emission units:

- (a) One (1) arrow shaft preparation and cutting operation, constructed in 1938, with a maximum production capacity of 4,500 arrows per hour, with particulate emissions controlled by two (2) cyclone dust collectors, identified as DC-1 and DC-2, installed in 1990, and exhausting to stacks DC-1V and DC-2V, respectively.
- (b) One (1) arrow gluing, assembly, and lacquering operation, constructed in 1938, with a maximum production capacity of 4,500 arrows per hour, exhausting to the indoors or through stacks DC-1V and DC-2V. Adhesive is applied to the arrow shafts and components using needle/bead application. Lacquer is applied to the arrow shafts using dip coating in a lacquer bath.
- (c) One (1) wash buff operation, constructed in 1938, with a maximum production capacity of 4,500 arrows per hour, with negligible emissions of air pollutants.
- (c) One (1) fletching operation, constructed in 1938, consisting of gluing of fletching onto arrow shafts, using spray needle application of adhesive onto arrow shafts, with a maximum production capacity of 4,500 arrows per hour, exhausting to the indoors.
- (d) Paved roads and parking lots with public access.

#### **Emission Units and Pollution Control Equipment Removed From the Source**

The source no longer manufactures broad head blades and the eight (8) dip tanks were removed from the source.

#### **"Integral Part of the Process" Determination (if applicable)**

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from the arrow shaft cutting operation were calculated after consideration of the particulate controls for purposes of determining permit level. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), potential particulate matter emissions from the arrow shaft cutting operation

were calculated before consideration of the particulate controls.

**Enforcement Issues**

True Flight Arrow Company, Inc., (now Easton Tru-Flite, LLC) was issued a Registered Construction and Operation Status, CP No. 181-2676-00024, issued on June 7, 1993, for a stationary plant for the manufacture and assembly of arrows and broadhead blades. On March 31, 2011, IDEM, OAQ conducted an inspection of the source and determined that the source did not reapply for a valid air registration pursuant to 326 IAC 2-5.5-2(b), which required existing emission sources with a valid air registration to reapply for approval by December 2000. On April 29, 2011, IDEM, OAQ sent a violation letter to Easton Tru-Flite, LLC that required the source to submit a new application for an air permit. On July 8, 2011, IDEM, OAQ received an application from Easton Tru-Flite, LLC.

As part of this TSD, the potential to emit air pollutants was re-evaluated (see Emission Calculations and Permit Level Determination – Exemption sections below). Based on the updated emission calculations, the source has the potential to emit air pollutants are within the exemption levels listed in 326 IAC 2-1.1-3(e)(1) (Exemptions). The source will be issued an Exemption.

IDEM is reviewing this matter and will take appropriate action.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Exemption**

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

| Process/<br>Emission Unit                        | Potential To Emit of the Entire Source (tons/year) |             |             |                 |                 |             |             |                                   |               |                        |
|--|--|-------------|-------------|-----------------|-----------------|-------------|-------------|-----------------------------------|---------------|------------------------|
|  | PM   | PM10*       | PM2.5       | SO <sub>2</sub> | NO <sub>x</sub> | VOC         | CO          | GHGs<br>as<br>CO <sub>2</sub> e** | Total<br>HAPs | Worst<br>Single<br>HAP |
| Arrow Shaft Preparation and Cutting Operation*   | 0.61   | 0.61        | 0.61        | 0.0             | 0.0             | 0.0         | 0.0         | 0.0                               | 0.0           | 0.0                    |
| Arrow Gluing, Assembly, and Lacquering Operation | 1.41   | 1.41        | 1.41        | 0.0             | 0.0             | 0.55        | 0.0         | 0.0                               | 0.103         | 0.066 (toluene)        |
| Paved Roads (fugitive)                           | 0.32   | 0.06        | 0.02        | 0.0             | 0.0             | 0.0         | 0.0         | 0.0                               | 0.0           | 0.0                    |
| <b>Total PTE of Entire Source</b>                | <b>2.34</b>  | <b>2.08</b> | <b>2.03</b> | <b>0.00</b>     | <b>0.00</b>     | <b>0.55</b> | <b>0.00</b> | <b>0.00</b>                       | <b>0.103</b>  | <b>0.066 (toluene)</b> |
| Exemptions Levels**                              | 5  | 5           | 5           | 10              | 10              | 5 or 10     | 25          | 100,000 CO <sub>2</sub> e         | 25            | 10                     |
| Registration Levels**                            | 25   | 25          | 25          | 25              | 25              | 25          | 100         | 100,000 CO <sub>2</sub> e         | 25            | 10                     |

negl. = negligible  
 \*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 \*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.  
 \*\*\*The PTE of the arrow shaft cutting operation is after integral controls.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of all regulated are within the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

#### **Federal Rule Applicability Determination**

##### New Source Performance Standards (NSPS)

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

##### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (63.800 through 63.808) (326 IAC 20-14), are not included in the permit, since this source does not manufacture plywood or composite wood products (PCWP) and this source is not a major source of HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, 40 CFR Part 63, Subpart QQQQ (63.4670 through 63.4781) (326 IAC 20-79), are not included in the permit, because this source is not a major source of HAP emissions and does include surface coating of wood building products as defined by 40 CFR 63.4781. This source only manufactures arrows, which are not used in the construction of buildings.
- (d) The requirements of the national Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63, Subpart HHHHHH (63.11169 through 63.11180) (326 IAC 20), are not included in this permit, since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipments, and does not perform spray application of coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrates.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

##### Compliance Assurance Monitoring (CAM)

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

#### **State Rule Applicability Determination**

The following state rules are applicable to the source:

326 IAC 2-1.1-3 (Exemptions)

Exemption applicability is discussed under the Permit Level Determination – Exemption section above.

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

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

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.

326 IAC 5-1 (Opacity Limitations)

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

- (1) Opacity shall not exceed an average of thirty percent (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.

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

326 IAC 6.5 (PM Limitations Except Lake County)

This source is not subject to 326 IAC 6.5 because it is not located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne County and it does not have the potential to emit particulate matter is equal to or greater than 10 tons per year.

326 IAC 6.8 (PM Limitations for Lake County)

This source is not subject to 326 IAC 6.8 because it is not located in Lake County and it does not have the potential to emit particulate matter is equal to or greater than 10 tons per year.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD

Arrow Shaft Preparation and Cutting Operation

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

Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable to the Arrow Shaft Preparation and Cutting Operation, since it has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Arrow Gluing, Assembly, and Lacquering Operation

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

Pursuant to 326 IAC 6-3-1(b)(15), the Arrow Gluing, Assembly, and Lacquering Operation is not subject to the requirements of 326 IAC 6-3, since it has the potential to use less than five (5) gallons per day of surface coatings (cyanoacrylate adhesives and lacquer).

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The Arrow Gluing, Assembly, and Lacquering Operation is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from is less than twenty-five (25) tons per year.

326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating Operations)

Pursuant to 326 IAC 8-2-1(a)(4), this rule applies to facilities located in any county, constructed after July 1, 1990, which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls, and that perform surface coating of metal and plastic parts as specified in 326 IAC 8-2-9(a) and (b). The Arrow Gluing, Assembly, and Lacquering Operation is not subject to the requirements of 326 IAC 8-2-9, since it has potential VOC emissions of less than fifteen (15) pounds per day before add-on controls.

326 IAC 8-2-10 (VOC Rules: Flat Wood Panels; Manufacturing Operations)

This rule applies to facilities located in Elkhart County, existing as of July 1, 1990, and facilities located in any county, constructed after July 1, 1990, that perform surface finishing of flat wood panels, as defined by 326 IAC 8-2-10(a), and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

The requirements of 326 IAC 8-2-10 are not applicable to this source, since this source does not perform surface finishing of flat wood panels, as defined by 326 IAC 8-2-10(a), and since it has potential VOC emissions of less than fifteen (15) pounds per day before add-on controls. This source applies adhesives and lacquering to arrow shafts and components.

326 IAC 8-2-12 (VOC Rules: Wood Furniture and Cabinet Coating)

This rule applies to facilities located in any county, constructed after July 1, 1990, that perform surface coating of wood furniture (or wood furniture components), including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material. The requirements of 326 IAC 8-2-12 are not applicable to this source, since this source does not perform surface coating of wood furniture or cabinets. This source applies adhesives and lacquering to arrow shafts and components.

326 IAC 8-6 (VOC Rules: Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, this rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. Pursuant to 326 IAC 8-6-1, this source is not subject to the requirements 326 IAC 8-6, because this source, which is located in White County, did not commence operation after October 7, 1974 and prior to January 1, 1980, and does not have potential VOC emissions of 100 tons per year or more.

**326 IAC 8-7 (VOC Rules: Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)**

Pursuant to 326 IAC 8-7-2(a), this source is not subject to the requirements of 326 IAC 8-7, since it is not located in Lake, Porter, Clark, or Floyd County, and it does not have coating facilities with a total potential to emit VOC equal to or greater than 10 tons per year.

**326 IAC 8-11-3 (VOC Rules: Wood Furniture Coatings)**

The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source is not located in Lake, Porter, Clark, or Floyd County and does include wood furniture manufacturing operations.

**326 IAC 8-14 (VOC Rules: Architectural and Industrial Maintenance (AIM) Coatings)**

Pursuant to 326 IAC 8-14, this source is not subject to the requirements of 326 IAC 8-14, because this source does not apply any architectural coating or industrial maintenance coating as defined by 326 IAC 8-14-2.

**326 IAC 8-15 (VOC Rules: Standards for Consumer and Commercial Products)**

Pursuant to 326 IAC 8-15, this source is not subject to the requirements of 326 IAC 8-15, because this source does not manufacture any chemically formulated consumer products listed under any of the product categories in 326 IAC 8-15-3(a).

**326 IAC 8-17 (VOC Rules: Industrial Solvent Cleaning Operations)**

Pursuant to 326 IAC 8-17-1, this source is not subject to the requirements of 326 IAC 8-17, since it is not located in Lake or Porter County, and it does not have the potential to emit VOC equal to or greater than 3 tons per rolling 12 month period from solvent cleaning operations.

**326 IAC 8-19 (VOC Rules: Control of Volatile Organic Compound Emissions from Process Vents in Batch Operations)**

Pursuant to 326 IAC 8-19-1, this source is not subject to the requirements of 326 IAC 8-19, since it is not located in Lake or Porter County, it does not have the potential to emit VOC greater than or equal to one hundred (100) tons per year, and it does not have a batch process train associated with any of the SIC Codes listed under 326 IAC 8-19-1(a).

**326 IAC 8-20 (VOC Rules: Industrial Wastewater)**

Pursuant to 326 IAC 8-20-1, this source is not subject to the requirements of 326 IAC 8-20, since it is not located in Lake or Porter County, it does not have the potential to emit VOC greater than or equal to one hundred (100) tons per year from emission sources listed under 326 IAC 8-20-1(a)(2), and it does not facility operations specifically listed under any of the SIC Codes listed under 326 IAC 8-20-1(a)(3).

**326 IAC 8-22 (VOC Rules: Miscellaneous Industrial Adhesives)**

Pursuant to 326 IAC 8-22-1, this source is not subject to the requirements of 326 IAC 8-22, since it is not located in Lake or Porter County, it does not have the potential to emit VOC equal to or greater than 3 tons per rolling 12 month period from all miscellaneous industrial adhesive application processes.

There are no other 326 IAC 8 Rules that are applicable to the Arrow Gluing, Assembly, and Lacquering Operation.

**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 July 8, 2011. Additional information received on August 10, 2011.

The continued operation of this source shall be subject to the conditions of the attached proposed Exemption No. E181-30691-00024. The staff recommends to the Commissioner that this Exemption be approved.

|                     |
|---------------------|
| <b>IDEM Contact</b> |
|---------------------|

- (a) Questions regarding this proposed permit can be directed to Nathan Bell at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-5670 or toll free at 1-800-451-6027 extension 3-5670.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

Appendix A: Emission Calculations  
Emissions Summary

Company Name: Easton Tru-Flite, LLC  
 Source Address: 2709 S. Freeman Road, Monticello, IN 47960  
 Permit Number: E181-30691-00024  
 Reviewer: Nathan Bell

| Uncontrolled Potential to Emit (PTE) (tons/year) |             |             |             |             |             |             |             |              |              |                      |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|--------------|--------------|----------------------|
| Emission Unit/Activity                           | PM          | PM10        | PM2.5       | SO2         | NOx         | VOC         | CO          | GHGs as CO2e | Total HAPs   | Worst Single HAP     |
| Arrow Shaft Preparation and Cutting Operation*   | 1.23        | 1.23        | 1.23        | 0.0         | 0.0         | 0.0         | 0.0         | 0.0          | 0.0          | 0.0                  |
| Arrow Gluing, Assembly, and Lacquering Operation | 1.41        | 1.41        | 1.41        | 0.0         | 0.0         | 0.55        | 0.0         | 0.0          | 0.103        | toluene              |
| Paved Roads (fugitive)                           | 0.32        | 0.06        | 0.02        | 0.0         | 0.0         | 0.0         | 0.0         | 0.0          | 0.0          | 0.0                  |
| <b>Totals</b>                                    | <b>2.95</b> | <b>2.70</b> | <b>2.65</b> | <b>0.00</b> | <b>0.00</b> | <b>0.55</b> | <b>0.00</b> | <b>0.00</b>  | <b>0.103</b> | <b>0.066 toluene</b> |

| Controlled Potential to Emit (PTE) (tons/year)   |             |             |             |             |             |             |             |              |              |                      |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|--------------|--------------|----------------------|
| Emission Unit/Activity                           | PM          | PM10        | PM2.5       | SO2         | NOx         | VOC         | CO          | GHGs as CO2e | Total HAPs   | Worst Single HAP     |
| Arrow Shaft Preparation and Cutting Operation*   | 0.61        | 0.61        | 0.61        | 0.0         | 0.0         | 0.0         | 0.0         | 0.0          | 0.0          | 0.0                  |
| Arrow Gluing, Assembly, and Lacquering Operation | 1.41        | 1.41        | 1.41        | 0.0         | 0.0         | 0.55        | 0.0         | 0.0          | 0.103        | toluene              |
| Paved Roads (fugitive)                           | 0.32        | 0.06        | 0.02        | 0.0         | 0.0         | 0.0         | 0.0         | 0.0          | 0.0          | 0.0                  |
| <b>Totals</b>                                    | <b>2.34</b> | <b>2.08</b> | <b>2.03</b> | <b>0.00</b> | <b>0.00</b> | <b>0.55</b> | <b>0.00</b> | <b>0.00</b>  | <b>0.103</b> | <b>0.066 toluene</b> |

\*In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge (ALJ) Garretson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from the arrow shaft cutting operation was calculated after consideration of the controls for purposes of determining permit level. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), potential particulate matter emissions from the arrow shaft cutting operation were calculated before consideration of the baghouse controls.

**Appendix A: Emission Calculations**  
**Arrow Shaft Preparation and Cutting Operation**

**Company Name:** Easton Tru-Flite, LLC  
**Source Address:** 2709 S. Freeman Road, Monticello, IN 47960  
**Permit Number:** E181-30691-00024  
**Reviewer:** Nathan Bell

**Dust Collection Sampling Data**

|                                      |  |      |   |
|--------------------------------------|--|------|---|
| Actual Hours of Operation =          | <table border="1"><tr><td>10</td></tr></table>   | 10   | hours/day   |
| 10                                   |  |      |   |
| Actual Days of Operation =           | <table border="1"><tr><td>5</td></tr></table>    | 5    | days  |
| 5                                    |  |      |   |
| Actual Hours of Operation =          | <table border="1"><tr><td>50</td></tr></table>   | 50   | hours (sample period)                                     |
| 50                                   |  |      |   |
| Actual Amount of Dust Collected =    | <table border="1"><tr><td>7</td></tr></table>    | 7    | lbs (for cyclone dust collectors DC-1 and DC-2, total)    |
| 7                                    |  |      |   |
| Potential Amount of Dust Collected = | <table border="1"><tr><td>0.14</td></tr></table> | 0.14 | lbs/hr (for cyclone dust collectors DC-1 and DC-2, total) |
| 0.14                                 |  |      |   |

**Potential Emissions of PM/PM10/PM2.5**

Potential emissions of PM/PM10/PM2.5 are calculated based upon the amount of dust collected in both of the cyclone dust collectors DC-1 and DC-2 as follows:

|  |  |      |           |
|--|--|------|-----------|
| Worst Case Dust Control Efficiency* =  | <table border="1"><tr><td>50%</td></tr></table>  | 50%  |           |
| 50%                                    |  |      |           |
| Uncontrolled PM/PM10/PM2.5 Emissions = | <table border="1"><tr><td>0.28</td></tr></table> | 0.28 | lbs/hour  |
| 0.28                                   |  |      |           |
| Uncontrolled PM/PM10/PM2.5 Emissions = | <table border="1"><tr><td>1.23</td></tr></table> | 1.23 | tons/year |
| 1.23                                   |  |      |           |
| Controlled PM/PM10/PM2.5 Emissions =   | <table border="1"><tr><td>0.14</td></tr></table> | 0.14 | lbs/hour  |
| 0.14                                   |  |      |           |
| Controlled PM/PM10/PM2.5 Emissions =   | <table border="1"><tr><td>0.61</td></tr></table> | 0.61 | tons/year |
| 0.61                                   |  |      |           |

**Methodology**

\*Dust control efficiency for PM2.5, based on information provided by the source.  
 Actual Hours of Operation (hours) = [Actual Hours of Operation (hours/day)] \* [Actual Days of Operation (days)]  
 Particulate emissions assumed to be all PM2.5. Therefore, PM = PM10 = PM2.5  
 Uncontrolled Emissions (lbs/hour) = [Potential Amount of Dust Collected (lb/hr)] / [Dust Control Efficiency (%)]  
 Uncontrolled Emissions (tons/year) = [Uncontrolled Emissions (lbs/hour)] \* [8760 hours/year] \* [ton/2000 lbs]  
 Controlled Emissions (lbs/hour) = [Uncontrolled Emissions (lbs/hour)] [1 - Dust Control Efficiency (%)]  
 Controlled Emissions (tons/year) = [Uncontrolled Emissions (tons/year)] [1 - Dust Control Efficiency (%)]

Company Name: Easton Tru-Fills, LLC  
Source Address: 2709 S. Freeman Road, Monticello, IN 47960  
Permit Number: E181-30981-00024  
Reviewer: Nathan Bell

Material Usage and Production Data

| Material                   | Actual Material Usage (gal/year) | Actual Hours of Operation (hours/year) | Maximum Material Usage (gal/year) | Maximum Hours of Operation (hours/year) | Maximum Material Usage (gal/day) | Maximum Material Usage (units/day) |
|----------------------------|----------------------------------|--|-----------------------------------|---|----------------------------------|------------------------------------|
| Cyanoacrylate Adhesives    | 158.0                            | 1940                                   | 0.0514                            | 24                                      | 1.9546                           |                                    |
| Acetone (clean up solvent) | 440.0                            | 1940                                   | 0.2265                            | 24                                      | 5.4433                           |                                    |
| (non-HAP, non-VOC)         |                                  |  |                                   |   |                                  |                                    |
| Lacquers (Clear Acrylic)   | 10.0                             | 1940                                   | 0.0052                            | 24                                      | 0.1237                           |                                    |
| (non-HAP, non-VOC)         |                                  |  |                                   |   |                                  |                                    |
| Isopropyl Alcohol          | 2.0                              | 1940                                   | 0.0010                            | 24                                      | 0.0247                           |                                    |
| Methyl Spirit              | 5.0                              | 1940                                   | 0.0026                            | 24                                      | 0.0616                           |                                    |

\*Based on actual operating schedule of 194 days of operation per year and 10 hours of operation per day = 1940 hours/year.

Methodology

Maximum Material Usage (gal/unit) = [Maximum Material Usage (gal/year)] / [Maximum Production Capacity (units/day)] \* [Maximum Days of Operation (days/year)]  
Maximum Production Capacity (units/hr) = [Maximum Production Capacity (units/day)] / [Maximum Hours of Operation (hours/day)]  
Maximum Material Usage (gal/unit) = [Maximum Material Usage (gal/year)] \* [Maximum Production Capacity (units/hr)]  
Maximum Material Usage (gal/day) = [Maximum Material Usage (gal/year)] \* [24 hours/day]

Volatile Organic Compounds (VOC) and Particulate Matter (PM)

| Material                   | Density (lb/gal) | Weight % Volatile (H2O & Organics) | Weight % Water + VOCs | Weight % Solids | Volume % Water + Non-VOCs | Volume % Solids | Maximum Paint Usage (gal/year) | Pounds VOC per gallon of water and non-VOCs coating | PTE of VOC (lb/hr) | PTE of VOC (tons/year) | PTE of PMPM10/PM2.5 (tons/year) | lb VOC per gal solids | Transfer Efficiency |
|----------------------------|------------------|------------------------------------|-----------------------|-----------------|---------------------------|-----------------|--------------------------------|---|--------------------|------------------------|---------------------------------|-----------------------|---------------------|
| Cyanoacrylate Adhesives*   | 8.76             | 10.0%                              | 0.0%                  | 98.0%           | 2.0%                      | 98.0%           | 0.0814                         | 0.89  | 1.712              | 0.312                  | 1.41                            | 0.89                  | 50%                 |
| Acetone (clean up solvent) | 6.61             | 100.0%                             | 100.0%                | 0.0%            | 100.0%                    | 0.0%            | 0.2268                         | NA  | 0.000              | 0.000                  | 0.00                            | NA                    | 100%                |
| (non-HAP, non-VOC)         |                  |                                    |                       |                 |                           |                 |                                |   |                    |                        |                                 |                       |                     |
| Lacquers (Clear Acrylic)   | 7.38             | 80.9%                              | 0.0%                  | 19.1%           | 0.0%                      | 19.1%           | 0.0052                         | 5.87  | 0.031              | 0.135                  | 0.00                            | 31.24                 | 100%                |
| (non-HAP, non-VOC)         |                  |                                    |                       |                 |                           |                 |                                |   |                    |                        |                                 |                       |                     |
| Isopropyl Alcohol          | 6.55             | 100.0%                             | 0.0%                  | 0.0%            | 0.0%                      | 0.0%            | 0.0010                         | 6.55  | 0.007              | 0.162                  | 0.00                            | NA                    | 100%                |
| Methyl Spirit              | 6.84             | 100.0%                             | 0.0%                  | 0.0%            | 0.0%                      | 0.0%            | 0.0026                         | 6.84  | 0.017              | 0.411                  | 0.00                            | NA                    | 100%                |
| <b>Totals</b>              |                  |                                    |                       |                 |                           |                 |                                |   | <b>3.02</b>        | <b>0.55</b>            | <b>1.41</b>                     |                       |                     |

Methodology

\*Cyanoacrylate (e.g. super glue) is an acrylic resin which rapidly polymerizes in the presence of water (including moisture in the air), forming long, strong chains, joining the bonded surfaces together. As a worst case, adhesive filmlets, it is assumed that 10% of the cyanoacrylate adhesives could be volatilized as VOC after application but before polymerizing/solidifying.  
\*\*Flashing applications are spraying where the shaft is passed in front of a spray needle. Other adhesive applications are needle-based applications where the adhesive is applied through a needle onto the surface of the shaft prior to it being dipped into the bath. The arrow shaft is passed through a lacquer bath and at the edge of the bath the shaft goes through a squeegee that removes any excess lacquer prior to it being dipped into the bath. For these calculations, it is assumed that the application of the cyanoacrylate adhesives to arrow shafts has an average transfer efficiency of 50%, and the dipping of arrow shafts in the lacquer bath has a transfer efficiency of 100%.

Pounds of VOC per Gallon Coating = [Density (lb/gal)] \* [Weight % VOC] / [1 - Volume % water]

PTE of VOC (lb/hr) = [Density (lb/gal)] \* [Weight % VOC]

PTE of VOC (tons/year) = [Pounds of VOC per Gallon Coating (lb/gal)] \* [Maximum Paint Usage (gal/year)]

PTE of VOC (tons/year) = [PTE of VOC (lb/hr)] \* [24 hours/day]

PTE of PMPM10/PM2.5 (tons/year) = [PTE of VOC (lb/hr)] \* [865 days/year] \* [1 ton/2000 lb]

Pounds VOC per Gallon of Solids = [Density (lb/gal)] \* [Weight % VOC] / [Volume % Solids]

Hazardous Air Pollutants (HAPs)

| Material                   | Weight % Toluene | Weight % Xylene | Weight % Ethylbenzene | Weight % Naphthalene | PTE of Toluene (tons/year) | PTE of Xylene (tons/year) | PTE of Ethylbenzene (tons/year) | PTE of Naphthalene (tons/year) |
|----------------------------|------------------|-----------------|-----------------------|----------------------|----------------------------|---------------------------|---------------------------------|--------------------------------|
| Cyanoacrylate Adhesives    | 0.0%             | 0.0%            | 0.0%                  | 0.0%                 | 0.0                        | 0.0                       | 0.0                             | 0.0                            |
| Acetone (clean up solvent) | 0.0%             | 0.0%            | 0.0%                  | 0.0%                 | 0.0                        | 0.0                       | 0.0                             | 0.0                            |
| (non-HAP, non-VOC)         |                  |                 |                       |                      |                            |                           |                                 |                                |
| Lacquers (Clear Acrylic)   | 39.87%           | 18.96%          | 0.0%                  | 0.0%                 | 0.07                       | 0.03                      | 0.0                             | 0.0                            |
| (non-HAP, non-VOC)         |                  |                 |                       |                      |                            |                           |                                 |                                |
| Isopropyl Alcohol          | 0.0%             | 0.0%            | 0.0%                  | 0.0%                 | 0.0                        | 0.0                       | 0.0                             | 0.0                            |
| Methyl Spirit              | 0.0%             | 5.0%            | 1.0%                  | 1.0%                 | 0.0037                     | 0.0037                    | 0.0007                          | 0.0007                         |
| <b>Totals</b>              |                  |                 |                       |                      | <b>0.056</b>               | <b>0.035</b>              | <b>0.001</b>                    | <b>0.001</b>                   |
| <b>TOTAL HAPs</b>          |                  |                 |                       |                      | <b>0.103</b>               |                           |                                 | <b>0.001</b>                   |

Methodology

PTE of HAPs (tons/yr) = [Density (lb/gal)] \* [Maximum Paint Usage (gal/year)] \* [Weight % HAP] \* [8760 hours/yr] \* [1 ton/2000 lb]

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

**Company Name:** Easton Tru-Flite, LLC  
**Source Address:** 2709 S. Freeman Road, Monticello, IN 47960  
**Permit Number:** E181-30691-00024  
**Reviewer:** Nathan Bell

**Paved Roads at Industrial Site**

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

Vehicle Information (provided by source)

| Type   | Maximum number of vehicles per day | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight Loaded (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|--|------------------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Vehicle Type 1 (entering plant) (one-way trip) | 50.0                               | 1.5   | 75.0                             | 2.0                               | 150.0                                 | 300                                  | 0.057                              | 4.3                               | 1555.4                           |
| Vehicle Type 1 (leaving plant) (one-way trip)  | 50.0                               | 1.5   | 75.0                             | 2.0                               | 150.0                                 | 300                                  | 0.057                              | 4.3                               | 1555.4                           |
| Vehicle Type 2 (entering plant) (one-way trip) | 4.0                                | 1.0   | 4.0                              | 10.0                              | 40.0                                  | 300                                  | 0.057                              | 0.2                               | 83.0                             |
| Vehicle Type 2 (leaving plant) (one-way trip)  | 4.0                                | 1.0   | 4.0                              | 10.0                              | 40.0                                  | 300                                  | 0.057                              | 0.2                               | 83.0                             |
| <b>Total</b>                                   |                                    |   | <b>158.0</b>                     |                                   | <b>380.0</b>                          |                                      |                                    | <b>9.0</b>                        | <b>3276.7</b>                    |

Average Vehicle Weight Per Trip = 2.4 tons/trip  
Average Miles Per Trip = 0.06 miles/trip

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

|           | PM    | PM10   | PM2.5   |   |
|-----------|-------|--------|---------|---|
| where k = | 0.011 | 0.0022 | 0.00054 | lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)  |
| W =       | 2.4   | 2.4    | 2.4     | tons = average vehicle weight (provided by source)  |
| sL =      | 9.7   | 9.7    | 9.7     | g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3) |

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

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

|  | PM    | PM10  | PM2.5  |         |
|--|-------|-------|--------|---------|
| Unmitigated Emission Factor, Ef =      | 0.213 | 0.043 | 0.0104 | lb/mile |
| Mitigated Emission Factor, $E_{ext}$ = | 0.195 | 0.039 | 0.0096 | lb/mile |

| Process  | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM10 (tons/yr) | Unmitigated PTE of PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10 (tons/yr) | Mitigated PTE of PM2.5 (tons/yr) |
|--|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|
| Vehicle Type 1 (entering plant) (one-way trip) | 0.17                            | 0.03                              | 0.01                               | 0.15                          | 0.03                            | 0.01                             |
| Vehicle Type 1 (leaving plant) (one-way trip)  | 0.17                            | 0.03                              | 0.01                               | 0.15                          | 0.03                            | 0.01                             |
| Vehicle Type 2 (entering plant) (one-way trip) | 0.01                            | 0.00                              | 0.00                               | 0.01                          | 0.00                            | 0.00                             |
| Vehicle Type 2 (leaving plant) (one-way trip)  | 0.01                            | 0.00                              | 0.00                               | 0.01                          | 0.00                            | 0.00                             |
|  | <b>0.35</b>                     | <b>0.07</b>                       | <b>0.02</b>                        | <b>0.32</b>                   | <b>0.06</b>                     | <b>0.02</b>                      |

**Methodology**

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

**Abbreviations**

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

## **SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED**

**TO:** John Gooding  
Easton Tru-flite LLC  
2709 S Freeman Road  
Monticello, IN 47960

**DATE:** August 29, 2011

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

**SUBJECT:** Final Decision  
Exemption  
181-30691-00024

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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

|                            |   |   |   |  |
|----------------------------|---|---|---|--|
| IDEM Staff                 | DPABST 8/29/2011<br>Easton Tru-Flite LLC 181-30691-00024 (Final)                  |   | Type of Mail:<br><br><b>CERTIFICATE OF MAILING ONLY</b> | AFFIX STAMP<br>HERE IF<br>USED AS<br>CERTIFICATE<br>OF MAILING |
| Name and address of Sender |  | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>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    |                | John Gooding Easton Tru-Flite LLC 2709 S Freeman Rd Monticello IN 47960-7488 (Source CAATS) (CONFIRM DELIVERY) |         |                 |                            |               |                 |          |          |          |                |         |
| 2    |                | Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |
| 3    |                | Monticello City Council and Mayors Office 227 N. Main Street Monticello IN 47960 (Local Official)              |         |                 |                            |               |                 |          |          |          |                |         |
| 4    |                | White County Commissioners P.O. Box 260 Monticello IN 47960-0260 (Local Official)                              |         |                 |                            |               |                 |          |          |          |                |         |
| 5    |                | Ms. Magje Read P.O. Box 248 Battle Ground IN 47920 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |
| 6    |                | Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 (Affected Party)                                       |         |                 |                            |               |                 |          |          |          |                |         |
| 7    |                | White County Health Department 315 N Illinois St Monticello IN 47960 (Health Department)                       |         |                 |                            |               |                 |          |          |          |                |         |
| 8    |                | Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)   |         |                 |                            |               |                 |          |          |          |                |         |
| 9    |                | White County BOAC 2222 Airport Road Monticello IN 47960 (Affected Party)                                       |         |                 |                            |               |                 |          |          |          |                |         |
| 10   |                | T & L Sharpening 2663 S. Freeman Road Monticello IN 47960 (Affected Party)                                     |         |                 |                            |               |                 |          |          |          |                |         |
| 11   |                | MRP 2787 S. Freeman Road Monticello IN 47960 (Affected Party)  |         |                 |                            |               |                 |          |          |          |                |         |
| 12   |                | John Hubbard 306 Holly Creek Dr Irmo SC 29063 (Affected Party)   |         |                 |                            |               |                 |          |          |          |                |         |
| 13   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 14   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 15   |                |  |         |                 |                            |               |                 |          |          |          |                |         |

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|---|--|--|--|
| 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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> 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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