



# 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: June 5, 2012

RE: Alpha Systems, Inc. / 039-30703-00504

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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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Alpha Systems, Inc.**  
**5120 Beck Dr and 21680 Protecta Dr**  
**Elkhart, Indiana 46516**

(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. F039-30703-00504   |   |
| Issued by:<br><br>Nathan C. Bell, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: Jun 5, 2012<br>Expiration Date: June 5, 2022 |

## TABLE OF CONTENTS

|   |           |
|---|-----------|
| <b>A. SOURCE SUMMARY</b> .....  | <b>4</b>  |
| A.1 General Information [326 IAC 2-8-3(b)]  |           |
| A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]   |           |
| A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]  |           |
| A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]  |           |
| A.5 FESOP Applicability [326 IAC 2-8-2]   |           |
| <b>B. GENERAL CONDITIONS</b> .....  | <b>8</b>  |
| B.1 Definitions [326 IAC 2-8-1]   |           |
| B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]  |           |
| B.3 Term of Conditions [326 IAC 2-1.1-9.5]  |           |
| B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]  |           |
| B.5 Severability [326 IAC 2-8-4(4)]   |           |
| B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]  |           |
| B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]   |           |
| B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]  |           |
| B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]   |           |
| B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]   |           |
| B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]  |           |
| B.12 Emergency Provisions [326 IAC 2-8-12]  |           |
| B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]   |           |
| B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]  |           |
| B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination<br>[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]    |           |
| B.16 Permit Renewal [326 IAC 2-8-3(h)]  |           |
| B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]  |           |
| B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]   |           |
| B.19 Source Modification Requirement [326 IAC 2-8-11.1]   |           |
| B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2]<br>[IC 13-30-3-1]   |           |
| B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]  |           |
| B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]<br>[326 IAC 2-1.1-7]   |           |
| B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]  |           |
| <b>C. SOURCE OPERATION CONDITIONS</b> .....   | <b>18</b> |
| <b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>  |           |
| C.1 Particulate Emission Limitations For Processes with Process Weight Rates<br>Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2] |           |
| C.2 Overall Source Limit [326 IAC 2-8]  |           |
| C.3 Opacity [326 IAC 5-1]   |           |
| C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]   |           |
| C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]  |           |
| C.6 Fugitive Dust Emissions [326 IAC 6-4]   |           |
| C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]   |           |
| <b>Testing Requirements [326 IAC 2-8-4(3)]</b>  |           |
| C.8 Performance Testing [326 IAC 3-6]   |           |

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

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

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

**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]
- C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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

**Stratospheric Ozone Protection**

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

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 25**

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

- D.1.1 Hazardous Air Pollutants (HAP) [326 IAC 2-8] [326 IAC 2-4.1]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.3 Particulate [326 IAC 6-3-2]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 Volatile Organic Compounds and Hazardous Air Pollutant [326 IAC 8-1-2] [326 IAC 8-1-4]

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

- D.1.6 Monitoring

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

- D.1.7 Record Keeping Requirement
- D.1.8 Reporting Requirement

Certification Form ..... 29  
Emergency Occurrence Form ..... 30  
Quarterly Report Form, VOC Usage ..... 32  
Quarterly Report Forms, HAP Usage ..... 33-34  
Quarterly Deviation and Compliance Monitoring Report Form ..... 35

## 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 adhesive, fiberglass mold, and plastic/vacuum-formed products manufacturing company.

|                              |  |
|------------------------------|--|
| Source Address:              | 5120 Beck Dr and 21680 Protecta Dr, Elkhart, Indiana<br>46516  |
| General Source Phone Number: | 574-295-5206   |
| SIC Code:                    | 2891 (Adhesive and Sealants),<br>3089 (Plastic Products, Not Elsewhere Classified)   |
| County Location:             | Elkhart  |
| Source Location Status:      | Attainment for all criteria pollutants   |
| Source Status:               | Federally Enforceable State Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>1 of 28 Source Categories |

### A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

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This stationary adhesive, fiberglass mold, and plastic/vacuum-formed products manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 5120 Beck Dr, Elkhart, IN; and
- (b) Plant 2 is located at 21680 Protecta Dr, Elkhart, IN.

The two (2) plants have different SIC codes: The Beck Drive Plant manufactures adhesives, with an SIC code of 2891. The Protecta Drive Plant manufactures fiberglass molds and plastic/vacuum formed products, with an SIC code of 3088. However, they have a support relationship, are located on one or more contiguous (or adjacent) properties, and are still under common ownership. Therefore, they are considered one (1) major source, as defined by 326 IAC 2-7-1(22).

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

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

#### **Beck Drive Plant:**

- (a) One (1) solvent-based adhesives production area, including the following:
  - (1) One (1) mix tank, identified as M-1, maximum capacity of 500 gallons, with filling, dispersion, and cleanup operations, with a maximum raw material throughput of 586 pounds per hour, constructed in 2000, venting inside the building.
  - (2) One (1) mix tank, identified as M-2, maximum capacity of 400 gallons, with filling, dispersion, and cleanup operations, maximum raw material throughput of 277 pounds per hour constructed in 2000, venting inside the building.

- (3) One (1) mix tank, identified as M-3, with a maximum capacity of 300 gallons, with filling, dispersion, and cleanup operations, constructed in 2000, all venting inside the building.
  - (4) One (1) 900 gallon ribbon blender, identified as RB-1, totally enclosed, for blending products produced in the mix tanks, with a maximum capacity of 2,500 pounds per hour, constructed in 2000.
  - (5) One (1) solvent-based bulk press drum filling machine, identified as TS4, constructed prior to 2000, with a maximum raw material filling rate of 350 pounds per minute, and three (3) Graco Tube fillers, identified as TS1 through TS3, with a maximum raw material filling rate of 8 pounds per minute, each, venting inside the building.
- (b) Activities or categories of activities with individual or combinations of HAPs less than the thresholds in 326 IAC 2-7-1(21):
- (1) Four (4) organic storage tanks, identified as T1 through T4, a maximum capacity of 8,000 gallons each, located above ground and exhausting to the atmosphere. Tanks identified as T1 and T2 are vertical fixed roof tanks. Tanks identified as T3 and T4 are flat top tanks.
  - (2) One (1) polyurethane adhesive production area, used to produce adhesives that are less than 5% by volume of VOC's, excluding HAPs, including the following:
    - (A) one (1) 2000 gallon capacity mix/blending tank, identified as M10;
    - (B) one (1) 700 gallon reactor, identified as R1;
    - (C) one (1) 1500 gallon reactor, identified as R2; and
    - (D) one (1) 500 gallon reactor, identified as R3.
    - (E) one (1) 300 gallon mixer, identified as M9
  - (3) One (1) water-based adhesive production area, used to produced adhesives that are less than 5% by volume of VOCs, excluding HAPs, including the following:
    - (A) two (2) 350 gallon capacity mix/blending tanks that alternate to serve this one process, identified as M4.
    - (B) four (4) 280 gallon capacity mix/blending tanks, identified as M5 through M8.
    - (C) one (1) 55 gallon Waka Mill Mixer.
  - (4) One (1) water-based bulk product filling machine, identified as TS5, constructed prior to 2000, with a maximum raw material filling rate of 33.6 pounds per minute, venting inside the building.
  - (5) One (1) hot melt adhesive production area, consisting of the following:
    - (A) one (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer, identified as M13.
    - (B) one (1) Franklin Miller Model KM20 Vulcanator for rubber shredding, with a capacity of 500 pounds per hour of rubber and 30 pounds of calcium carbonate per hour, constructed in 2005, equipped with a cartridge filter for particulate control, and exhausting inside the building.

- (C) one (1) 300 gallon 100% solids Paddle Mixer, identified as M12.
- (D) one (1) 150 gallon 100% solids Ross Mixer, identified as M14.
- (6) Three (3) storage tanks, identified as T-5 through T-7, with a maximum capacity of 8,280 gallons each, located above ground and venting inside the building. The tanks identified as T-5 through T-7 are vertical fixed roof tanks.
- (7) One (1) storage tank, identified as T-8, with a maximum capacity of 10,000 gallons, located above ground and venting inside the building. T-8 is a vertical fixed roof tank.

**Protecta Drive Plant:**

- (c) One (1) mold booth using High Volume Low Pressure (HVLP) spray for gel coating and using non-atomizing flow coating for resin application, identified as Mold Booth #1, constructed in 2002, with a maximum throughput of 0.125 units per hour, consisting of gel and resin application, controlled by dry filters for particulate matter overspray and exhausting to one (1) stack identified as SV-001.
- (d) One (1) glue line, consisting of either manual or low pressure, non-atomizing flow coating application of glue manual application of two-sided glue tape to polycarbonate skylights, constructed in 2002, with a maximum throughput of 37.7 units per hour and exhausting inside the building.

**A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]**

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The source also consists of the following insignificant activities:

- (a) Space heaters, process heaters, or boilers using the following fuel:
  - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
    - (A) Nine (9) natural gas-fired heaters, identified as C1 through C9, with a maximum heat input capacity of 0.2 MMBtu/hr each and exhausting to the atmosphere.
    - (B) Ten (10) natural gas-fired infrared heater tubes, with a maximum heat input capacity of 0.1 MMBtu/hr each and exhausting to stacks identified as TH-001 through TH-010.
    - (C) Four (4) natural gas-fired ovens, with a maximum heat input capacity of 2.5 MMBtu/hr each and exhausting to stacks identified as OVN-001 through OVN-004.
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Cleaners and solvents characterized as follows:

- (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (f) Blowdown for any of the following: compressors; pumps.
- (g) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38°C).
- (h) Other activities or categories with lead emissions less than 0.6 ton/year, carbon monoxide (CO) emissions less than 25 lbs/day, sulfur dioxides (SO<sub>2</sub>) less than 25 lbs/day, particulate matter (PM) less than 25 lbs/day, nitrogen oxides (NO<sub>x</sub>) less than 25 lbs/day, and volatile organic compounds (VOC) less than 15 lbs/day:
- (1) One (1) rubber storage area.
  - (2) Four (4) vacuum former machines.
  - (3) One (1) woodworking and plastics machining area, constructed prior to 2000, with a maximum wood rate of 6.0 pounds per hour, a maximum plastic rate of 350.0 pounds per hour, exhausting to the atmosphere and consisting of the following:
    - (A) Ten (10) inch table saw;
    - (B) Sixty (60) inch edge sander;
    - (C) Two (2) fourteen (14) inch band saws;
    - (D) Ten (10) inch swing saw;
    - (E) Three (3) router tables;
    - (F) One (1) vacuum former machine;
    - (G) One (1) CNC router;
    - (H) Miscellaneous hand operated saws, grinders and drills; and
    - (I) One (1) hydraulic press.
  - (4) One (1) extrusion compounding line, identified as ECL1, constructed in 2008, producing plastic pellets, with a maximum capacity of 1500 pounds per batch, equipped with a filter system for particulate control, exhausting indoors.

A.5 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]

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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)]

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- (a) This permit, F039-30703-00504, 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]

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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]

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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)]

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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)]

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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)]

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- (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)]

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- (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)]**

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- (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 April 15 of each year to:

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

- (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)]**

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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)]

- (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]**

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- (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, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 F039-30703-00504 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)]**

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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]**

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(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)]**

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(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]**

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- (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]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) 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)(1) and (c). 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)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
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(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
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]**

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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 gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) 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]**

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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]**

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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]**

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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]**

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- (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]**

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- (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]**

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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)]**

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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)]**

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- (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]**

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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]

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- (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. Support information includes the following:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of this paragraph. 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**

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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:

#### Beck Drive Plant:

- (a) One (1) solvent-based adhesives production area, including the following:
  - (1) One (1) mix tank, identified as M-1, maximum capacity of 500 gallons, with filling, dispersion, and cleanup operations, with a maximum raw material throughput of 586 pounds per hour, constructed in 2000, venting inside the building.
  - (2) One (1) mix tank, identified as M-2, maximum capacity of 400 gallons, with filling, dispersion, and cleanup operations, maximum raw material throughput of 277 pounds per hour constructed in 2000, venting inside the building.
  - (3) One (1) mix tank, identified as M-3, with a maximum capacity of 300 gallons, with filling, dispersion, and cleanup operations, constructed in 2000, all venting inside the building.
  - (4) One (1) 900 gallon ribbon blender, identified as RB-1, totally enclosed, for blending products produced in the mix tanks, with a maximum capacity of 2,500 pounds per hour, constructed in 2000.
  - (5) One (1) solvent-based bulk press drum filling machine, identified as TS4, constructed prior to 2000, with a maximum raw material filling rate of 350 pounds per minute, and three (3) Graco Tube fillers, identified as TS1 through TS3, with a maximum raw material filling rate of 8 pounds per minute, each, venting inside the building.
- (b) Activities or categories of activities with individual or combinations of HAPs less than the thresholds in 326 IAC 2-7-1(21):
  - (5) One (1) hot melt adhesive production area, consisting of the following:
    - (A) one (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer, identified as M13.
    - (B) one (1) Franklin Miller Model KM20 Vulcanator for rubber shredding, with a capacity of 500 pounds per hour of rubber and 30 pounds of calcium carbonate per hour, constructed in 2005, equipped with a cartridge filter for particulate control, and exhausting inside the building.
    - (C) one (1) 300 gallon 100% solids Paddle Mixer, identified as M12.
    - (D) one (1) 150 gallon 100% solids Ross Mixer, identified as M14.

#### Protecta Drive Plant:

- (c) One (1) mold booth using High Volume Low Pressure (HVLP) spray for gel coating and using non-atomizing flow coating for resin application, identified as Mold Booth #1, constructed in 2002, with a maximum throughput of 0.125 units per hour, consisting of gel and resin application, controlled by dry filters for particulate matter overspray and exhausting to one (1) stack identified as SV-001.

### Insignificant Activities

- (h) Other activities or categories with lead emissions less than 0.6 ton/year, carbon monoxide (CO) emissions less than 25 lbs/day, sulfur dioxides (SO<sub>2</sub>) less than 25 lbs/day, particulate matter (PM) less than 25 lbs/day, nitrogen oxides (NO<sub>x</sub>) less than 25 lbs/day, and volatile organic compounds (VOC) less than 15 lbs/day:
  - (3) One (1) woodworking and plastics machining area, constructed prior to 2000, with a maximum wood rate of 6.0 pounds per hour, a maximum plastic rate of 350.0 pounds per hour, exhausting to the atmosphere and consisting of the following:
    - (A) Ten (10) inch table saw;
    - (B) Sixty (60) inch edge sander;
    - (C) Two (2) fourteen (14) inch band saws;
    - (D) Ten (10) inch swing saw;
    - (E) Three (3) router tables;
    - (F) One (1) vacuum former machine;
    - (G) One (1) CNC router;
    - (H) Miscellaneous hand operated saws, grinders and drills; and
    - (I) One (1) hydraulic press.

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

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

#### D.1.1 Hazardous Air Pollutants (HAP) [326 IAC 2-8] [326 IAC 2-4.1]

- (a) The single HAP solvent usage from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) at the Beck Drive Plant shall be less than 588,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month. Each single HAP emissions shall not exceed 0.034 lb of HAP emitted per pound of solvent used.
- (b) The total combined HAP solvent usage from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) at the Beck Drive Plant shall be less than 1,295,000 lbs per twelve (12) consecutive month period, with compliance determined at the end of each month. Total combined HAP emissions shall not exceed 0.034 lb of HAP emitted per pound of solvent used.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of HAPs to less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs, and shall render 326 IAC 2-4.1 and 326 IAC 2-7 not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 8-1-6 not applicable, the Permittee shall comply with the following:

- (a) total VOC solvent usage from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) at the Beck Drive Plant shall be less than 1,470,588 lbs per twelve (12) consecutive month period, with compliance determined at the end of each month, and

- (b) total VOC emissions from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) shall not exceed 0.034 lb of VOC emitted per pound of solvent used.

Compliance with these limits shall limit VOC emissions from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) to less than 25 tons per year and shall render the requirements of 326 IAC 8-1-6 not applicable.

**D.1.3 Particulate [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the adhesive mixers (M-1, M-2, M-3, RB-1), the one (1) woodworking and plastics machining area, the hot melt adhesives mixers (M12, M13, M14), and the one (1) Franklin Miller Model KM20 Vulcanator shall be limited by the following:

| Process                                   | Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable Particulate Emission Rate (lb/hr) |
|---|-------------------------------|---|
| Adhesive Mixers (M-1, M-2, M-3, RB-1)     | 0.300                         | 1.83  |
| Woodworking/Plastics Machining Area       | 0.175                         | 1.28  |
| Hot Melt Adhesives Mixers (M12, M13, M14) | 0.245                         | 1.58  |
| Vulcanator                                | 0.265                         | 1.68  |

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 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

- (b) Pursuant to 326 IAC 6-3-2, particulate from the one (1) mold booth shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

**Compliance Determination Requirements**

**D.1.5 Volatile Organic Compounds and Hazardous Air Pollutant [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC and HAP limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.6 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters used to control the one (1) mold booth. To monitor the performance of the

dry filters, weekly observations shall be made of the overspray from the one (1) mold booth while the facilities 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 and Exceedances contains the Permittee's obligation with regard to the reasonable response 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 stack 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 the reasonable response 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.1.7 Record Keeping Requirement**

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2.
  - (1) The VOC and HAP content of each coating material and solvent used.
  - (2) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAP usage for each month; and
  - (5) The weight of VOCs/HAPs emitted at the Beck Drive facility for each compliance period.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### **D.1.8 Reporting Requirement**

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A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 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).

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

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

Source Name: Alpha Systems, Inc.  
Source Address: 5120 Beck Dr and 21680 Protecta Dr, Elkhart, Indiana 46516  
FESOP Permit No.: F039-30703-00504

**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: Alpha Systems, Inc.  
Source Address: 5120 Beck Dr and 21680 Protecta Dr, Elkhart, Indiana 46516  
FESOP Permit No.: F039-30703-00504

**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"><li>• 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</li><li>• 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</li></ul> |
|--|

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<br>Describe:   |
| Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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**

Source Name: Alpha Systems, Inc.  
Source Address: 5120 Beck Dr and 21680 Protecta Dr, Elkhart, Indiana 46516  
FESOP Permit No.: F039-30703-00504  
Facility: Solvent-Based Adhesive Production Area (M-1, M-2, M-3, RB-1, TS1 through TS4) at the Beck Drive Plant  
Parameter: Total VOC solvent usage  
Limit: Less than 1,470,588 lbs VOC solvent per 12 consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

| Month | Column 1   | Column 2           | Column 1 + Column 2 |
|-------|------------|--------------------|---------------------|
|       | This Month | Previous 11 Months | 12 Month Total      |
|       |            |                    |                     |
|       |            |                    |                     |
|       |            |                    |                     |

- 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**

Source Name: Alpha Systems, Inc.  
Source Address: 5120 Beck Dr and 21680 Protecta Dr, Elkhart, Indiana 46516  
FESOP Permit No.: F039-30703-00504  
Facility: Solvent-Based Adhesives Production Area (M-1, M-2, M-3, RB-1, TS1 through TS4) at the Beck Drive Plant  
Parameter: Worst single HAP solvent usage  
Limit: Less than 588,000 pounds of individual HAP containing solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

| Month | Column 1   | Column 2           | Column 1 + Column 2 |
|-------|------------|--------------------|---------------------|
|       | This Month | Previous 11 Months | 12 Month Total      |
|       |            |                    |                     |
|       |            |                    |                     |
|       |            |                    |                     |

- 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**

Source Name: Alpha Systems, Inc.  
Source Address: 5120 Beck Dr and 21680 Protecta Dr, Elkhart, Indiana 46516  
FESOP Permit No.: F039-30703-00504  
Facility: Solvent-Based Adhesives Production Area (M-1, M-2, M-3, RB-1, TS1 through TS4) at the Beck Drive Plant  
Parameter: Total HAP solvent usage  
Limit: Less than 1,295,000 lbs total HAP containing solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

| Month | Column 1   | Column 2           | Column 1 + Column 2 |
|-------|------------|--------------------|---------------------|
|       | This Month | Previous 11 Months | 12 Month Total      |
|       |            |                    |                     |
|       |            |                    |                     |
|       |            |                    |                     |

- 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: Alpha Systems, Inc.  
Source Address: 5120 Beck Dr and 21680 Protecta Dr, Elkhart, Indiana 46516  
FESOP Permit No.: F039-30703-00504

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

|   |                               |
|---|-------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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  |                               |
| <b>Permit Requirement</b> (specify permit condition #)  |                               |
| <b>Date of Deviation:</b>   | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>  |                               |
| <b>Probable Cause of Deviation:</b>   |                               |
| <b>Response Steps Taken:</b>  |                               |
| <b>Permit Requirement</b> (specify permit condition #)  |                               |
| <b>Date of Deviation:</b>   | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>  |                               |
| <b>Probable Cause of Deviation:</b>   |                               |
| <b>Response Steps Taken:</b>  |                               |

|  |                               |
|--|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit  
Renewal

**Source Background and Description**

|                            |  |
|----------------------------|--|
| <b>Source Name:</b>        | <b>Alpha Systems, Inc.</b>   |
| <b>Source Location:</b>    | <b>5120 Beck Dr and 21680 Protecta Dr, Elkhart, IN 46516</b>                               |
| <b>County:</b>             | <b>Elkhart</b>   |
| <b>SIC Code:</b>           | <b>2891 (Adhesive and Sealants),<br/>3089 (Plastic Products, Not Elsewhere Classified)</b> |
| <b>Permit Renewal No.:</b> | <b>F039-30703-00504</b>  |
| <b>Permit Reviewer:</b>    | <b>Christine L. Filutze</b>  |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Alpha Systems, Inc. relating to the operation of a stationary adhesive, fiberglass mold, and plastic/vacuum-formed products manufacturing company. On July 12, 2011, Alpha Systems, Inc. submitted an application to the OAQ requesting to renew its operating permit. Alpha Systems, Inc. was issued a FESOP (F039-23530-00504) on April 24, 2007.

**Source Definition**

This Source Definition from the FESOP was incorporated into this permit as follows:

This adhesive, fiberglass mold, and plastic/vacuum-formed products manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 5120 Beck Dr, Elkhart, IN; and
- (b) Plant 2 is located at 21680 Protecta Dr, Elkhart, IN.

The two (2) plants have different SIC codes: The Beck Drive Plant manufactures adhesives, with an SIC code of 2891. The Protecta Drive Plant manufactures fiberglass molds and plastic/vacuum formed products, with an SIC code of 3088. However, they have a support relationship, are located on one or more contiguous (or adjacent) properties, and are still under common ownership. Therefore, they are considered one (1) major source, as defined by 326 IAC 2-7-1(22).

This determination was previously made in Minor Permit Revision No. 039-11874-00504 (to MSOP No. 039-11066-00504), issued on March 30, 2000. The previous determination included cast polymer operations at a third plant located at 5100 Beck Drive. All operations at the 5100 Beck Drive facility were discontinued as of March 2006.

|   |
|---|
| <b>Permitted Emission Units and Pollution Control Equipment</b> |
|---|

The source consists of the following permitted emission units:

**Beck Drive Plant:**

- (a) One (1) solvent-based adhesives production area, including the following:
  - (1) One (1) mix tank, identified as M-1, maximum capacity of 500 gallons, with filling, dispersion, and cleanup operations, with a maximum raw material throughput of 586 pounds per hour, constructed in 2000, venting inside the building.
  - (2) One (1) mix tank, identified as M-2, maximum capacity of 400 gallons, with filling, dispersion, and cleanup operations, maximum raw material throughput of 277 pounds per hour constructed in 2000, venting inside the building.
  - (3) One (1) mix tank, identified as M-3, with a maximum capacity of 300 gallons, with filling, dispersion, and cleanup operations, constructed in 2000, all venting inside the building.
  - (4) One (1) 900 gallon ribbon blender, identified as RB-1, totally enclosed, for blending products produced in the mix tanks, with a maximum capacity of 2,500 pounds per hour, constructed in 2000.
  - (5) One (1) solvent-based bulk press drum filling machine, identified as TS4, constructed prior to 2000, with a maximum raw material filling rate of 350 pounds per minute, and three (3) Graco Tube fillers, identified as TS1 through TS3, with a maximum raw material filling rate of 8 pounds per minute, each, venting inside the building.
  
- (b) Activities or categories of activities with individual or combinations of HAPs less than the thresholds in 326 IAC 2-7-1(21):
  - (1) Four (4) organic storage tanks, identified as T1 through T4, a maximum capacity of 8,000 gallons each, located above ground and exhausting to the atmosphere. Tanks identified as T1 and T2 are vertical fixed roof tanks. Tanks identified as T3 and T4 are flat top tanks.
  - (2) One (1) polyurethane adhesive production area, used to produce adhesives that are less than 5% by volume of VOC's, excluding HAPs, including the following:
    - (A) one (1) 2000 gallon capacity mix/blending tank, identified as M10;
    - (B) one (1) 700 gallon reactor, identified as R1;
    - (C) one (1) 1500 gallon reactor, identified as R2; and
    - (D) one (1) 500 gallon reactor, identified as R3.
    - (E) one (1) 300 gallon mixer, identified as M9
  - (3) One (1) water-based adhesive production area, used to produced adhesives that are less than 5% by volume of VOCs, excluding HAPs, including the following:
    - (A) two (2) 350 gallon capacity mix/blending tanks that alternate to serve this one process, identified as M4.
    - (B) four (4) 280 gallon capacity mix/blending tanks, identified as M5 through M8.

- (C) one (1) 55 gallon Waka Mill Mixer.
- (4) One (1) water-based bulk product filling machine, identified as TS5, constructed prior to 2000, with a maximum raw material filling rate of 33.6 pounds per minute, venting inside the building.
- (5) One (1) hot melt adhesive production area, consisting of the following:
  - (A) one (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer, identified as M13.
  - (B) one (1) Franklin Miller Model KM20 Vulcanator for rubber shredding, with a capacity of 500 pounds per hour of rubber and 30 pounds of calcium carbonate per hour, constructed in 2005, equipped with a cartridge filter for particulate control, and exhausting inside the building.
  - (C) one (1) 300 gallon 100% solids Paddle Mixer, identified as M12.
  - (D) one (1) 150 gallon 100% solids Ross Mixer, identified as M14.
- (6) Three (3) storage tanks, identified as T-5 through T-7, with a maximum capacity of 8,280 gallons each, located above ground and venting inside the building. The tanks identified as T-5 through T-7 are vertical fixed roof tanks.
- (7) One (1) storage tank, identified as T-8, with a maximum capacity of 10,000 gallons, located above ground and venting inside the building. T-8 is a vertical fixed roof tank.

**Protecta Drive Plant:**

- (c) One (1) mold booth using High Volume Low Pressure (HVLP) spray for gel coating and using non-atomizing flow coating for resin application, identified as Mold Booth #1, constructed in 2002, with a maximum throughput of 0.125 units per hour, consisting of gel and resin application, controlled by dry filters for particulate matter overspray and exhausting to one (1) stack identified as SV-001.
- (d) One (1) glue line, consisting of either manual or low pressure, non-atomizing flow coating application of glue manual application of two-sided glue tape to polycarbonate skylights, constructed in 2002, with a maximum throughput of 37.7 units per hour and exhausting inside the building.

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

The source has removed the following emission unit:

- (a) One (1) 300 gallon mix tank, designed as MT-1, with a maximum capacity of 2,500 pounds per hour and venting inside the building.

Note: Mix tank MT-1 was replaced by ribbon blender RB-1.

**Insignificant Activities**

The source also consists of the following insignificant activities:

- (a) Space heaters, process heaters, or boilers using the following fuel:
  - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
    - (A) Nine (9) natural gas-fired heaters, identified as C1 through C9, with a maximum heat input capacity of 0.2 MMBtu/hr each and exhausting to the atmosphere.
    - (B) Ten (10) natural gas-fired infrared heater tubes, with a maximum heat input capacity of 0.1 MMBtu/hr each and exhausting to stacks identified as TH-001 through TH-010.
    - (C) Four (4) natural gas-fired ovens, with a maximum heat input capacity of 2.5 MMBtu/hr each and exhausting to stacks identified as OVN-001 through OVN-004.
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (f) Blowdown for any of the following: compressors; pumps.
- (g) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38°C).
- (h) Other activities or categories with lead emissions less than 0.6 ton/year, carbon monoxide (CO) emissions less than 25 lbs/day, sulfur dioxides (SO<sub>2</sub>) less than 25 lbs/day, particulate matter (PM) less than 25 lbs/day, nitrogen oxides (NO<sub>x</sub>) less than 25 lbs/day, and volatile organic compounds (VOC) less than 15 lbs/day:
  - (1) One (1) rubber storage area.
  - (2) Four (4) vacuum former machines.
  - (3) One (1) woodworking and plastics machining area, constructed prior to 2000, with a maximum wood rate of 6.0 pounds per hour, a maximum plastic rate of

350.0 pounds per hour, exhausting to the atmosphere and consisting of the following:

- (A) Ten (10) inch table saw;
  - (B) Sixty (60) inch edge sander;
  - (C) Two (2) fourteen (14) inch band saws;
  - (D) Ten (10) inch swing saw;
  - (E) Three (3) router tables;
  - (F) One (1) vacuum former machine;
  - (G) One (1) CNC router;
  - (H) Miscellaneous hand operated saws, grinders and drills; and
  - (I) One (1) hydraulic press.
- (4) One (1) extrusion compounding line, identified as ECL1, constructed in 2008, producing plastic pellets, with a maximum capacity of 1500 pounds per batch, equipped with a filter system for particulate control, exhausting indoors.

#### Existing Approvals

Since the issuance of the FESOP (F039-23530-00504) on April 24, 2007, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. F039-27190-00504 issued on December 23, 2008; and
- (b) Administrative Amendment No. F039-28299-00504 issued on October 5, 2009.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

#### Enforcement Issue

There are no enforcement actions pending.

#### Emission Calculations

See Appendix A of this document for detailed emission calculations.

#### County Attainment Status

The source is located in Elkhart County.

| Pollutant        | Designation   |
|------------------|---|
| SO <sub>2</sub>  | Better than national standards.   |
| CO               | Unclassifiable or attainment effective November 15, 1990.                       |
| O <sub>3</sub>   | Attainment effective July 19, 2007, for the 8-hour ozone 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>Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour standard 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. Elkhart 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>**  
 Elkhart 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**  
 Elkhart 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**

Since this source is classified as a chemical process plant, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

| Unrestricted Potential Emissions |                 |
|----------------------------------|-----------------|
| Pollutant                        | Tons/year       |
| PM                               | 23.21           |
| PM <sub>10</sub>                 | 23.52           |
| PM <sub>2.5</sub>                | 23.52           |
| SO <sub>2</sub>                  | 0.03            |
| VOC                              | 31.82           |
| CO                               | 4.62            |
| NO <sub>x</sub>                  | 5.50            |
| GHGs as CO <sub>2</sub> e        | 6,636           |
| Single HAP                       | 28.54 (Toluene) |
| Total HAPs                       | 31.51           |

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (c) The potential to emit of each criteria pollutant is less than 100 tons per year. The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.

**Potential to Emit After Issuance**

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

| Process/<br>Emission Unit  | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) |                    |                     |                 |                 |              |             |                                 |               |                         |
|--|--|--------------------|---------------------|-----------------|-----------------|--------------|-------------|---------------------------------|---------------|-------------------------|
|  | PM   | PM <sub>10</sub> * | PM <sub>2.5</sub> * | 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  |
| <b>Beck Drive Plant</b>  |  |                    |                     |                 |                 |              |             |                                 |               |                         |
| Adhesives Production Area (M-1, M-2, M-3, RB-1, TS1 - TS4)         | 10.65  | 10.65              | 10.65               | 0.00            | 0.00            | <25          | 0.00        | 0                               | 22.02         | <10 Toluene             |
| Hot Melt Adhesives Mixers (M12, M13, M14)                          | 2.68   | 2.68               | 2.68                | 0.00            | 0.00            | 0.00         | 0.00        | 0                               | 0.00          | NA                      |
| Rubber Shredding (Vulcanator)                                      | 4.49   | 4.49               | 4.49                | 0.00            | 0.00            | 0.00         | 0.00        | 0                               | 0.00          | NA                      |
| Storage Tanks (T-5 through T-8)                                    | 0.00   | 0.00               | 0.00                | 0.00            | 0.00            | 0.59         | 0.00        | 0                               | 0.59          | 0.59 Vinyl Acetate      |
| <b>Protecta Drive Plant</b>  |  |                    |                     |                 |                 |              |             |                                 |               |                         |
| Mold Booth (Booth #1)  | 0.87   | 0.87               | 0.87                | 0.00            | 0.00            | 1.49         | 0.00        | 0                               | 1.38          | 1.38 Styrene            |
| Glue Line  | 0.00   | 0.00               | 0.00                | 0.00            | 0.00            | 0.90         | 0.00        | 0                               | 0.90          | 0.90 Methylene Chloride |
| <b>Insignificant Activities</b>                                    |  |                    |                     |                 |                 |              |             |                                 |               |                         |
| Natural Gas Combustion (C1-C9; TH-001 - TH-010; OVN-001 - OVN-004) | 0.10   | 0.42               | 0.42                | 0.03            | 5.50            | 0.30         | 4.62        | 6,636                           | 0.10          | 0.10 Hexane             |
| Woodworking and Plastics Machining Area                            | 2.40   | 2.40               | 2.40                | 0.00            | 0.00            | 0.00         | 0.00        | 0                               | 0.00          | NA                      |
| Compounding (ECL1)   | 2.02   | 2.02               | 2.02                | 0.00            | 0.00            | 0.00         | 0.00        | 0                               | 0.00          | NA                      |
| <b>Total PTE of Entire Source</b>                                  | <b>23.21</b>   | <b>23.52</b>       | <b>23.52</b>        | <b>0.03</b>     | <b>5.50</b>     | <b>28.28</b> | <b>4.62</b> | <b>6,636</b>                    | <b>&lt;25</b> | <b>&lt;10 Toluene</b>   |
| Title V Major Source Thresholds                                    | NA   | 100                | 100                 | 100             | 100             | 100          | 100         | 100,000                         | 25            | 10                      |
| PSD Major Source Thresholds  | 100  | 100                | 100                 | 100             | 100             | 100          | 100         | 100,000                         | NA            | NA                      |

| Process/<br>Emission Unit   | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) |                    |                     |                 |                 |     |    |                                 |               |                        |
|---|--|--------------------|---------------------|-----------------|-----------------|-----|----|---------------------------------|---------------|------------------------|
|   | PM   | PM <sub>10</sub> * | PM <sub>2.5</sub> * | 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 |
| negl. = negligible; NA = Not Applicable<br>*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".<br>**PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . |  |                    |                     |                 |                 |     |    |                                 |               |                        |

This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than one hundred (<100) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and it is in one of the twenty-eight (28) listed source categories.

**Federal Rule Applicability**

- (a) 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.
- (b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40c, Subpart Dc (326 IAC 12), are still not included in the permit for the nine (9) natural gas-fired heaters, identified as C1-C9, or the ten (10) natural gas-fired infrared heater tubes, since each has a maximum design heat input capacity of less than 10 MMBtu/hr.
- (c) The requirements of the New Source Performance Standards for Volatile Organic Liquid Storage Vessels 40 CFR 60, Subpart Kb (326 IAC 12), are still not included in this permit, since the storage tanks, identified as T1 through T8, each have a capacity of less than 75 cubic meters (19,813 gallons).
- (d) The requirements of the following New Source Performance Standards (NSPS) are not included in the permit, because this source does not "produce" chemicals (see note 1 below) and does not consist of air oxidation unit processes, distillation operations, or reactor processes. This source only blends chemicals to produce adhesives that are then packaged for offsite use.
  - (1) 40 CFR 60, Subpart VV (60.480 through 60.489), Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (326 IAC 12);
  - (2) 40 CFR 60, Subpart III (60.610 through 60.617), Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes (326 IAC 12);
  - (3) 40 CFR 60, Subpart NNN (60.660 through 60.668), Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (326 IAC 12); and
  - (4) 40 CFR 60, Subpart RRR (60.700 through 60.708), Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (326 IAC 12).

Note 1: The major processing steps employed in Synthetic Organic Chemicals Manufacturing Industry (SOCMI) can be classified in two broad categories: conversion

and separation. Conversion processes are chemical reactions that alter the molecular structure of the compounds involved. Separation operations divide mixtures into distinct fractions. [References: (1) EPA Office of Compliance Sector Notebook Project: Profile of the Organic Chemical Industry, 2nd Edition (EPA/310-R-02-001), November 2002, Section III.A.1, page 11; (2) Distillation Operations In Synthetic Organic Chemical Manufacturing - Background Information For Proposed Standards (EPA-450/3-83-005a), December 1983, Chapter 3, page 3-1; and (3) Guideline Series: Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry (EPA-450/4-91-031), August 1993, Chapter 2, page 2-1.]

- (e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (f) The requirements of the following National Emission Standard for Hazardous Air Pollutants (NESHAPs) are not included in the permit, because this source is not a major source of HAPs and this source does not "manufacture" chemicals as specified in this rule (see note 1 below). This source only blends chemicals to produce adhesives that are then packaged for offsite use (see note 2 below).
  - (1) 40 CFR 63, Subpart F (63.100 through 63.107), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry (326 IAC 20-11)
  - (2) 40 CFR 63, Subpart G (63.110 through 63.153), NESHAPs From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (326 IAC 20-11)
  - (3) 40 CFR 63, Subpart H (63.160 through 63.183), NESHAPs: Organic Hazardous Air Pollutants for Equipment Leaks (326 IAC 20-11)
  - (4) 40 CFR 63, Subpart I (63.190 through 63.193), NESHAPs: Certain Processes Subject to the Negotiated Regulation for Equipment Leaks (326 IAC 20-12)

Note 1: The major processing steps employed in Synthetic Organic Chemicals Manufacturing Industry (SOCMI) can be classified in two broad categories: conversion and separation. Conversion processes are chemical reactions that alter the molecular structure of the compounds involved. Separation operations divide mixtures into distinct fractions. [References: (1) EPA Office of Compliance Sector Notebook Project: Profile of the Organic Chemical Industry, 2nd Edition (EPA/310-R-02-001), November 2002, Section III.A.1, page 11; (2) Distillation Operations In Synthetic Organic Chemical Manufacturing - Background Information For Proposed Standards (EPA-450/3-83-005a), December 1983, Chapter 3, page 3-1; and (3) Guideline Series: Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry (EPA-450/4-91-031), August 1993, Chapter 2, page 2-1.]

Note 2: In the Hazardous Organic National Emission Standard for Hazardous Air Pollutants (NESHAP) Background Information Document (BID) Volume 2D: Comments on Applicability, National Impacts, and Overlap with Other Rules (EPA-453/R-94-003d), January 1994, page 3-51, the following discussion is included regarding the Hazardous Organic NESHAPs (HON) (40 CFR 63, Subpart F, G, H, I): "Processing of a chemical, as intended in the HON, involves one or more unit operations to change the physical or chemical characteristics of a raw material or an intermediate stream. Mere blending or repackaging of a finished product is not a process subject to the HON".

- (g) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63, Subpart FFFF (63.2430 through 63.2550) (326 IAC 20-84), are not included in the permit, because this source is not a major source of HAPs. However, this source does contain miscellaneous organic chemical manufacturing process units (MCPU) that produce an organic chemical classified using the 1987 version of SIC code 282, 283, 284, 285, 286, 287, 289, or 386, or the 1997 version of NAICS code 325, and is not specifically exempted under 40 CFR 63.2435(c). This source only blends chemicals to produce adhesives that are then packaged for offsite use under SIC code 2891 or NAICS code 325520 (see note 1 below).

Note 1: Pursuant to Federal Register 72 FR 41113 July 26, 2007 (See also Applicability Determination Index (ADI) Control Number M060034, Memorandum from Michael S. Alushin, EPA Office of Compliance, to John F. Metzger, P.E. of 3M EHS Operations, dated June 6, 2005), the following discussion is included regarding the applicability of 40 CFR part 63, Subpart FFFF, NESHAP for Miscellaneous Organic Chemical Manufacturing (MON rule): "Whether there is chemical reaction during the manufacturing process is not a factor for determining the applicability of the MON rule. Although chemical reaction is typically associated with the manufacture of organic chemicals, it is not exclusively so."

- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (63.3880 through 63.3981) (326 IAC 20-80), are not included in the permit, this source does not perform surface coating of miscellaneous metal parts and products and this source is not a major source of HAPs as defined in 40 CFR 63.2. This source only includes application of glue or glue tape to polycarbonate skylights.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (63.4480 through 63.4581) (326 IAC 20-81), are not included in the permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production (40 CFR 63.5780, Subpart WWWW) are still not included in the permit for the mold booth, since this source is not a major source of HAPs.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Operations (40 CFR 63.7980, Subpart HHHHH) are still not included in the permit since this source is not a major source of HAPs.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (63.7480 through 63.7575) (326 IAC 20-95), are not included in this permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJ, are not included in the permit for the natural gas fired heaters and ovens, because each is not considered a boiler as defined by 40 CFR 63.11237 and each combusts natural gas which is specifically exempted from this rule under 40 CFR 63.11195(e).
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Manufacturing for Area Sources, 40 CFR 63, Subpart VVVVVV

(63.11494 through 63.11503), are not included in the permit, because each chemical manufacturing process unit (CMPU) at this source does not use, generate, or produce any of the HAPs listed in Table 1 to this subpart in concentrations greater than 0.1 percent for the listed carcinogens or greater than 1.0 percent for the listed non-carcinogens (see note 1 below for EPA's meaning of "chemical manufacturing" with respect to this rule). In addition, the source is not engaged in any chemical manufacturing activities. The source mixes and repackages product and is not a major source of HAPs.

Note 1: Pursuant to the Response to Public Comments for National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources; Proposed Rule (40 CFR 63 Subpart VVVVVV) (October 16, 2009) (Docket ID No. EPA-HQ-OAR-2008-0334-0087), page 3-9, EPA states that "This rule covers material produced by blending, mixing, dilution, or other formulation operations that are described by NAICS 325 and are not a coating operations. General applicability is the same as for subpart FFFF." In addition, on page 3-10, EPA states that "If any blending, heating, or other physical or chemical changes occur, then the operation is chemical manufacturing and subject to the final rule."

- (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Chemical Preparations Industry, 40 CFR 63, SubpartBBBBBBB, are not included in the permit, because this source does not contain a "chemical preparations facility" or a "chemical preparations operation in target HAP service" as defined in 40 CFR 63.11588 (see note 1 below).

Note 1: Pursuant to in 40 CFR 63.11588, a chemical preparations facility consists the facility-wide collection of chemical preparation operations, including mixing, blending, milling, and extruding equipment used to manufacture chemical preparations. Chemical preparation means a target HAP-containing product, or intermediate used in the manufacture of other products, manufactured in a process operation described by the NAICS code 325998. Target HAP-containing means raw materials, intermediates, or products that contain one or more target HAP. Any material that contains compounds of chromium (VI), lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or manganese or chromium (III) compounds in amounts greater than or equal to 1.0 percent by weight (as the metal) is considered to be target HAP-containing. In target HAP service means that equipment in the chemical preparation operation either contains, contacts, or is processing target HAP-containing materials.

- (p) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

|   |
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| <b>State Rule Applicability - Entire Source</b> |
|---|

**326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

**326 IAC 2-2 (Prevention of Significant Deterioration(PSD))**

This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants are less than 100 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO<sub>2</sub>e per year, and this source is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

This source is not subject to the requirements of 326 IAC 2-4.1, since the potential to emit of HAPs from each of the facilities at this source is less than or limited 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.

### 326 IAC 2-8 (FESOP)

The Permittee has opted to limit HAP emissions from this source. The Permittee has accepted source-wide limits of less than 10 tons per year of any single HAP, and less than 25 tons per year of any combination of HAPs. Pursuant to 326 IAC 2-8 (FESOP),

- (a) The single HAP solvent usage from the solvent-based adhesives production area (M-1, M2, M3, RB-1, and TS1 through TS4) at the Beck Drive Plant shall be less than 588,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month. Each single HAP emissions shall not exceed 0.034 lb of HAP emitted per pound of solvent used. This limit is necessary to limit the PTE of individual HAP (toluene) from the Beck Drive Plant to less than 10 tons per year.

$$\text{Each Single HAP} = (588,000 \text{ lbs/yr}) * (0.034 \text{ lb/lb}) * (\text{ton}/2000 \text{ lbs}) = 9.996 \text{ tons/yr}$$

- (b) The total combined HAP solvent usage from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) at the Beck Drive Plant shall be less than 1,295,000 lbs per twelve (12) consecutive month period, with compliance determined at the end of each month. Total combined HAP emissions shall not exceed 0.034 lb of HAP emitted per pound of solvent used. This limit is necessary to limit the PTE of total HAPs from the Beck Drive Plant to less than 25 tons per year.

$$\text{Total Combined HAPs} = (1,295,000 \text{ lbs/yr}) * (0.034 \text{ lb/lb}) * (\text{ton}/2000 \text{ lbs}) = 22.02 \text{ tons/yr}$$

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of HAPs to less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs, and shall render 326 IAC 2-4.1 and 326 IAC 2-7 not applicable.

### 326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the 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.

### 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 one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

**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.

**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 Elkhart 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.

**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 the source does not sell, supply, offer for sale, or manufacture consumer products as defined by 326 IAC 8-15-2(37). Pursuant to 326 IAC 8-15-2(37), consumer product is defined as a chemically formulated product used by household and institutional consumers, including, but not limited to, the products listed under 326 IAC 8-15-2(37)(A). The source only supplies industrial users, not household or institutional consumers. Therefore, 326 IAC 8-15 does not apply.

**326 IAC 8-18 (VOC Rules; Synthetic Organic Chemical Manufacturing Industry Air Oxidation, Distillation, and Reactor Processes)**

Pursuant to 326 IAC 8-18-1, this source is not subject to the requirements of 326 IAC 8-18, since it is not located in Lake or Porter County, and does not contain any air oxidation unit processes, distillation operations, and reactor processes as defined by 326 IAC 8-18-1(b).

**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 8-18, since it is not located in Lake or Porter County, does not have the potential to emit VOC greater than or equal to one hundred (100) tons per year, and does not have 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, 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 does not have facility operations specifically listed under any of the SIC Codes listed under 326 IAC 8-20-1(a)(3).

|   |
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| <b>State Rule Applicability – Individual Facilities</b> |
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**Solvent-Based Adhesives Production Area (M-1, M-2, M-3, RB-1, and TS1 through TS4)**

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

Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to the adhesive mixers (M-1, M-2, M-3, RB-1), since these operations have potential particulate emissions greater

than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, the adhesive mixers (M-1, M-2, M-3, RB-1) shall be limited by the following:

| Process                               | Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable Particulate Emission Rate (lb/hr) |
|---------------------------------------|-------------------------------|---|
| Adhesive Mixers (M-1, M-2, M-3, RB-1) | 0.300                         | 1.83  |

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 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

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

The unlimited VOC potential emissions from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) is greater than twenty-five (25) tons per year. In order to render the requirements of 326 8-1-6 not applicable, the Permittee shall comply with the following:

- (a) total VOC solvent usage from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) at the Beck Drive Plant shall be less than 1,470,588 lbs per twelve (12) consecutive month period, with compliance determined at the end of each month, and
- (b) total VOC emissions from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) shall not exceed 0.034 lb of VOC emitted per pound of solvent used.

Compliance with these limits shall limit VOC emissions from the solvent-based adhesives production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) to less than 25 tons per year and shall render the requirements of 326 IAC 8-1-6 not applicable.

**Polyurethane and Water Based Adhesives Production Areas (M-4 through M-10, T1 through T4, R1 through R3, and Waka Miller Mixer)**

**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 Mixers M-4 through M-10 and the Waka Miller Mixer, since each has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

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

The units associated with the polyurethane and water based adhesives production areas (M-4 through M-10, T1 through T4, R1 through R3, and Waka Miller Mixer) are each not subject to the requirements of 326 IAC 8-1-6, since they each have unlimited VOC potential emissions of less than twenty-five (25) tons per year.

**Woodworking & Plastics Machining, Hot Melt Adhesives Production Area Mixers (M12, M13, M14), Vulcanator, and Extrusion Compounding Line**

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

Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to each of the woodworking and plastics machining area, the one (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer (M13), and the one (1) Franklin Miller Model

KM20 Vulcanator, since each of these operations has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-2, the one (1) woodworking and plastics machining area, the one (1) 600 gallon Ross Model FDA-600 fixed tank dual shaft 100% solids hot melt adhesives mixer (M13), and the one (1) Franklin Miller Model KM20 Vulcanator shall be limited by the following:

| Process                        | Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable Particulate Emission Rate (lb/hr) |
|--------------------------------|-------------------------------|---|
| Woodworking/Plastics Area      | 0.175                         | 1.28  |
| Hot Melt Adhesives Mixer (M13) | 0.245                         | 1.58  |
| Vulcanator                     | 0.265                         | 1.68  |

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 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

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

Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the extrusion compounding line (ECL1), since it has potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

#### **Storage Tanks**

##### 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Each storage tank has a maximum storage capacity less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable.

##### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Each diesel fuel storage tank at this source is not located in Clark, Floyd, Lake or Porter County. Therefore, the requirements of 326 IAC 8-9 do not apply.

#### **Mold Booth**

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

Pursuant to 326 IAC 6-3-1(b)(15), the mold booth (Booth #1) is subject to the requirements of 326 IAC 6-3, since it has the potential to use equal to or greater than five (5) gallons per day of surface coatings. Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) mold booth (Booth #1) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

The mold booth (Booth #1) is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

##### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

The mold booth (Booth #1) is not subject to 326 IAC 8-2-9, because it does not perform metal surface coating of any of the items listed under 326 IAC 8-2-9(a)(1) and this source does not operate any of the Standard Industrial Classification (SIC) Codes listed under 326 IAC 8-2-9(a)(1)(E). This process operates under SIC Code 2891.

**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 Elkhart 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.

There are no other 326 IAC 8 Rules that are applicable to the mold booth (Booth #1) at this source.

**Natural Gas-Fired Heaters, Heater Tubes, Ovens**

**326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)**

The natural gas-fired combustion sources, including the nine (9) natural gas-fired heaters, designated as C1-C9, the ten (10) natural gas-fired infrared heater tubes, and the four (4) natural gas-fired ovens, are not subject to 326 IAC 6-2-4 since they are not sources of indirect heating.

**326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)**

Pursuant to 326 IAC 7-1.1-1, each of the natural gas-fired heaters, heater tubes, and ovens at this source is not subject to the requirements of 326 IAC 7-1.1, since each has unlimited sulfur dioxide (SO<sub>2</sub>) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

|   |
|---|
| <b>Compliance Determination and Monitoring Requirements</b> |
|---|

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions. However, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The one (1) mold booth (Booth #1) at the Protecta Drive Plant has applicable compliance monitoring conditions as specified below:

- (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 one (1) mold booth while the facilities are in operation. Section C - Response to Excursions and

Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions and Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. Section C - Response to Excursions and Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary to ensure that the dry filters are operating properly and in accordance with manufacturer's specifications to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

#### **Recommendation**

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

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 12, 2011. Additional information was received on July 18, 2011; December 8, 9, 15, 16, 2011; January 6, 2012; February 21, 2012; March 8, 2012; March 21, 2012; April 12, 2012; and April 19, 2012.

#### **Conclusion**

The operation of this stationary adhesive, fiberglass mold, and plastic/vacuum-formed products manufacturing company shall be subject to the conditions of the attached FESOP Renewal No.F039-30703-00504.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Christine L. Filutze at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.
- (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: Process Particulate Emissions  
Summary**

**Company Name: Alpha Systems, Inc.  
Address City IN Zip: 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
Permit Number: F039-30703-00504  
Reviewer: Christine L. Filutze  
Date: April 23, 2012**

**Unlimited PTE**

| Process  | Potential to Emit (tons/year) |                  |                   |                 |             |              |             |                           |              |                    |                    |
|--|-------------------------------|------------------|-------------------|-----------------|-------------|--------------|-------------|---------------------------|--------------|--------------------|--------------------|
|  | PM                            | PM <sub>10</sub> | PM <sub>2.5</sub> | SO <sub>2</sub> | NOx         | VOC          | CO          | GHGs as CO <sub>2</sub> e | Total HAPs   | Single Highest HAP |                    |
| Adhesive Production Area (Mixing (M-1, M-2, M-3, RB-1) and Filling (TS1 through TS4) | 10.65                         | 10.65            | 10.65             | 0.00            | 0.00        | 28.54        | 0.00        | 0                         | 28.54        | 28.54              | Toluene            |
| Hot Melt Adhesives Mixers (M12, M13, M14)  | 2.68                          | 2.68             | 2.68              | 0.00            | 0.00        | 0.00         | 0.00        | 0                         | 0.00         | 0.00               |                    |
| Rubber Shredding (Vulcanator)  | 4.49                          | 4.49             | 4.49              | 0.00            | 0.00        | 0.00         | 0.00        | 0                         | 0.00         | 0.00               |                    |
| Storage Tanks (T-5 through T-8)  | 0.00                          | 0.00             | 0.00              | 0.00            | 0.00        | 0.59         | 0.00        | 0                         | 0.59         | 0.59               | Vinyl Acetate      |
| Mold Booth #1  | 0.87                          | 0.87             | 0.87              | 0.00            | 0.00        | 1.49         | 0.00        | 0                         | 1.38         | 1.38               | Styrene            |
| Glue Line  | 0.00                          | 0.00             | 0.00              | 0.00            | 0.00        | 0.90         | 0.00        | 0                         | 0.90         | 0.90               | Methylene Chloride |
| Natural Gas Combustion (C1 thru C9, TH-001 thru TH-010, OVN-001 thru OVN-004)        | 0.10                          | 0.42             | 0.42              | 0.03            | 5.50        | 0.30         | 4.62        | 6,636                     | 0.10         | 0.10               | Hexane             |
| Woodworking and Plastics Machining Area  | 2.40                          | 2.40             | 2.40              | 0.00            | 0.00        | 0.00         | 0.00        | 0                         | 0.00         | 0.00               |                    |
| Compounding (ECL1)   | 2.02                          | 2.02             | 2.02              | 0.00            | 0.00        | 0.00         | 0.00        | 0                         | 0.00         | 0.00               |                    |
| <b>Totals</b>  | <b>23.21</b>                  | <b>23.52</b>     | <b>23.52</b>      | <b>0.03</b>     | <b>5.50</b> | <b>31.82</b> | <b>4.62</b> | <b>6,636</b>              | <b>31.51</b> | <b>28.54</b>       | <b>Toluene</b>     |

**Limited PTE**

| Process  | Potential to Emit (tons/year) |                  |                   |                 |             |              |             |                           |              |                    |                    |
|--|-------------------------------|------------------|-------------------|-----------------|-------------|--------------|-------------|---------------------------|--------------|--------------------|--------------------|
|  | PM                            | PM <sub>10</sub> | PM <sub>2.5</sub> | SO <sub>2</sub> | NOx         | VOC          | CO          | GHGs as CO <sub>2</sub> e | Total HAPs   | Single Highest HAP |                    |
| Adhesive Production Area (Mixing (M-1, M-2, M-3, RB-1) and Filling (TS1 through TS4) | 10.65                         | 10.65            | 10.65             | 0.00            | 0.00        | 25.00        | 0.00        | 0                         | 22.02        | 9.996              | Toluene            |
| Hot Melt Adhesives Mixers (M12, M13, M14)  | 2.68                          | 2.68             | 2.68              | 0.00            | 0.00        | 0.00         | 0.00        | 0                         | 0.00         | 0.00               |                    |
| Rubber Shredding (Vulcanator)  | 4.49                          | 4.49             | 4.49              | 0.00            | 0.00        | 0.00         | 0.00        | 0                         | 0.00         | 0.00               |                    |
| Storage Tanks (T-5 through T-8)  | 0.00                          | 0.00             | 0.00              | 0.00            | 0.00        | 0.59         | 0.00        | 0                         | 0.59         | 0.59               | Vinyl Acetate      |
| Mold Booth #1  | 0.87                          | 0.87             | 0.87              | 0.00            | 0.00        | 1.49         | 0.00        | 0                         | 1.38         | 1.38               | Styrene            |
| Glue Line  | 0.00                          | 0.00             | 0.00              | 0.00            | 0.00        | 0.90         | 0.00        | 0                         | 0.90         | 0.90               | Methylene Chloride |
| Natural Gas Combustion (C1 thru C9, TH-001 thru TH-010, OVN-001 thru OVN-004)        | 0.10                          | 0.42             | 0.42              | 0.03            | 5.50        | 0.30         | 4.62        | 6,636                     | 0.10         | 0.10               | Hexane             |
| Woodworking and Plastics Machining Area  | 2.40                          | 2.40             | 2.40              | 0.00            | 0.00        | 0.00         | 0.00        | 0                         | 0.00         | 0.00               |                    |
| Compounding (ECL1)   | 2.02                          | 2.02             | 2.02              | 0.00            | 0.00        | 0.00         | 0.00        | 0                         | 0.00         | 0.00               |                    |
| <b>Totals</b>  | <b>23.21</b>                  | <b>23.52</b>     | <b>23.52</b>      | <b>0.03</b>     | <b>5.50</b> | <b>28.28</b> | <b>4.62</b> | <b>6,636</b>              | <b>24.98</b> | <b>9.996</b>       | <b>Toluene</b>     |

\*PTE of PM/PM10/PM2.5 for the hot melt adhesives mixer based on emission calculations contained in Minor Permit Modification No. 039-19510-00504, issued October 15, 2004

**Polyurethane and Water Based Adhesives Production Area (M-4 through M-10, T1 through T4, R1 through R3, Waka Miller Mixer, and TS5) and Solvent-Based Adhesives Production Area (M-1, M-2, M-3, RB-1, and TS1 through TS4)**

**Company Name:** Alpha Systems, Inc.  
**Address City IN Zip:** 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
**Permit Number:** F039-30703-00504  
**Reviewer:** Christine L. Filutze  
**Date:** April 23, 2012

**1. Polyurethane and Water Based Adhesive Production Areas (M-4 through M-10, T1 through T4, R1 through R3, Waka Miller Mixer, and TS5)**

Polyurethane and water based adhesive production areas (Mixers M-4 through M-10, Storage Tanks T1 through T4, Reactors R1 through R3, the Waka Miller Mixer, and TS5) have a low vapor pressure and are assumed to have negligible VOC/HAP emissions.

Based on information provided by the source, Mixers M-4 through M-10 and the Waka Miller Mixer have negligible particulate (PM/PM10/PM2.5) emissions

**2. Solvent-Based Adhesives Production Area (M-1, M-2, M-3, RB-1, and TS1 through TS4)**

The adhesive manufacturing operations are conducted in batches. Each batch takes several hours to complete the mixing process. The solvent incorporated into these products are raw materials required to be maintained in the finished product for sale. The batches are mixed in closed mixers and significant steps are taken to retain the solvent content. Calculations are based on the throughput of the largest mixer and the worst case/highest solvent content product produced (1010 Roof Sealant).

Based on the document entitled "Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8, February 2005", total VOC emissions for overall operations from a paint manufacturing facility can be estimated by using an emission factor of 0.034 lb VOCs emitted/lb solvent used. In addition, the guidance document also indicates that the AP-42, Chapter 6.4 (Paint And Varnish), Table 6.4-1, emission factors are for plantwide emissions. Therefore, the combined VOC/PM emissions from Adhesive Mixing/Blending (M-1, M-2, M-3, RB-1) and Container Filling (TS1 through TS4) are calculated as follows

**Emission Factors and Worst Case Product Properties**

| Emission Units   | VOC Emission Factor* (lb/lb of solvent) | HAP Emission Factor* (lb/lb of solvent) | PM/PM10/PM2.5 Emission Factor** (lb/ton of solids) |
|--|---|---|--|
| Solvent-Based Adhesives Production Area (M-1, M-2, M-3, RB-1, and TS1 through TS4) | 0.034                                   | 0.034                                   | 20   |

**Unlimited Potential to Emit (PTE)**

Unlimited Throughput of Worst Case Product = 599 (lbs of product/hr)  
 Worst Case Weight % Solvent = 32.00% (note: solvent assumed VOC and HAP (toluene))  
 Unlimited Throughput of Solvent = 191.68 (lbs of solvent/hr)  
 Worst Case Weight % Solids = 40.60%  
 Unlimited Throughput of Solids = 243.194 (lbs of solids/hr)

| Emission Units   | Unlimited PTE of VOC (lbs/hr) | Unlimited PTE of VOC (tons/yr) | Unlimited PTE of Toluene (tons/yr) | Unlimited PTE of Total HAPs (tons/yr) | Unlimited PTE of PM/PM10/PM2.5 (lbs/hr) | Unlimited PTE of PM/PM10/PM2.5 (tons/yr) |
|--|-------------------------------|--------------------------------|------------------------------------|---------------------------------------|---|--|
| Solvent-Based Adhesives Production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) | 6.52                          | 28.54                          | 28.54                              | 28.54                                 | 2.43                                    | 10.65                                    |

**Limited Potential to Emit (PTE)**

VOC Solvent Usage Limit = 1,470,588 (lbs/yr)  
 Each Single HAP Solvent Usage Limit = 588,000 (lbs/yr)  
 Total Combined HAP Solvent Usage Limit = 1,295,000 (lbs/yr)

| Emission Units   | Limited PTE of VOC (tons/yr) | Limited PTE of Each Single HAP (tons/yr) | Limited PTE of Total HAPs (tons/yr) |
|--|------------------------------|--|-------------------------------------|
| Solvent-Based Adhesives Production area (M-1, M-2, M-3, RB-1, and TS1 through TS4) | 25.00                        | 9.996                                    | 22.02                               |

**Methodology**

\*Emission Factor from Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8, February 2005. This document is currently available on the internet at: [http://www.epa.gov/ttn/chief/eiip/techreport/volume02/i08\\_feb2005.pdf](http://www.epa.gov/ttn/chief/eiip/techreport/volume02/i08_feb2005.pdf)

\*\*Emission Factors from AP-42, Chapter 6.4 (Paint And Varnish), Table 6.4-1

\*\*\*PM10 and PM2.5 emissions assumed equal to PM emissions

Unlimited Throughput of Solvent (lbs of solvent/hr) = [Unlimited Throughput of Worst Case Product (lbs of product/hr)] \* [Worst Case Weight % Solvent]  
 Unlimited Throughput of Solids (lbs of solids/hr) = [Unlimited Throughput of Worst Case Product (lbs of product/hr)] \* [Worst Case Weight % Solids]  
 Unlimited PTE of VOC (lbs/hr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [VOC Emission Factor (lb/lb of solvent)]  
 Unlimited PTE of VOC (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [VOC Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]  
 Unlimited PTE of Toluene (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]  
 Unlimited PTE of Total HAPs (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]  
 Unlimited PTE of PM/PM10/PM2.5 (lbs/hr) = [Unlimited Throughput of Solids (lbs of solids/hr)] \* [PM/PM10/PM2.5 Emission Factor (lb/ton of solids)] \* [ton/2000 lbs]  
 Unlimited PTE of PM/PM10/PM2.5 (tons/yr) = [Unlimited PTE of PM/PM10/PM2.5 (lbs/hr)] \* [8760 hours/yr] \* [ton/2000 lbs]

Limited PTE of VOC (tons/yr) = [VOC Solvent Usage Limit (lbs/yr)] \* [VOC Emission Factor (lb/lb of solvent)] \* [ton/2000 lbs]

Limited PTE of Each Single HAP (tons/yr) = [Each Single HAP Solvent Usage Limit (lbs/yr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [ton/2000 lbs]

Limited PTE of Total HAPs (tons/yr) = [Total Combined Solvent Usage Limit (lbs/yr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [ton/2000 lbs]

**326 IAC 6-3-2 Allowable PM Emission Rate**

| Process                               | Control      | Process Weight Rate (lbs/hr)* | Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr) | Uncontrolled PTE of PM (lb/hr) | Controlled Efficiency** | Controlled PTE of PM (lb/hr) |
|---------------------------------------|--------------|-------------------------------|-------------------------------|---|--------------------------------|-------------------------|------------------------------|
| Adhesive Mixers (M-1, M-2, M-3, RB-1) | Closed Mixer | 599                           | 0.300                         | 1.83  | 2.43                           | 70.0%                   | 0.73                         |

**Methodology**

\*Based on information provided by the source.

\*\*Estimate control efficiency for an enclosed/covered mix tank.

Process Weight Rate (lbs/hr) = [Weight of Boards Processed (lbs/board)] \* [Maximum Production Rate (boards/hr)]

Process Weight Rate (tons/hr) = [Process Weight Rate (lbs/hr)] \* [ton/2000 lbs]

**Appendix A: Emissions Calculations  
Hot Melt Adhesives Production Area Mixers (M12, M13, M14)**

**Company Name:** Alpha Systems, Inc.  
**Address City IN Zip:** 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
**Permit Number:** F039-30703-00504  
**Reviewer:** Christine L. Filutze  
**Date:** April 23, 2012

**Uncontrolled PTE of PM/PM10/PM2.5\***

| Process                                   | Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr)** | Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)** |
|---|--|---|
| Hot Melt Adhesives Mixers (M12, M13, M14) | 0.611  | 2.68  |

**Methodology**

\*PTE of PM/PM10/PM2.5 for the hot melt adhesives mixer based on emission calculations contained in Minor Permit Modification No. 039-19510-00504, issued October 15, 2004.

\*\*PM2.5 emissions assumed equal to PM10 emissions.

Emissions (tons/yr) = Emissions (lbs/hr) x (8,760 hours/year) / (2,000 lbs/ton)

**326 IAC 6-3-2 Allowable PM Emission Rate**

| Process                            | Process Weight Rate (lbs/hr)* | Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr) | Uncontrolled PTE of PM (lb/hr) |
|------------------------------------|-------------------------------|-------------------------------|---|--------------------------------|
| Woodworking and Plastics Machining | 489.0                         | 0.245                         | 1.60  | 0.611                          |

**Methodology**

Process Weight Rate (lbs/hr) = [Weight of Boards Processed (lbs/board)] \* [Maximum Production Rate (boards/hr)]

Process Weight Rate (tons/hr) = [Process Weight Rate (lbs/hr)] \* [ton/2000 lbs]

**Appendix A: Emission Calculations  
Rubber Shredding (Vulcanator)**

**Company Name:** Alpha Systems, Inc.  
**Address City IN Zip:** 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
**Permit Number:** F039-30703-00504  
**Reviewer:** Christine L. Filutze  
**Date:** April 23, 2012

**A. Rubber Shredding**

Emission factor for shredding rubber from AP-42 Chapter 6.6.2 (Polyethylene Terephthalene)  
 Table 6.6.2-2, footnote (f) is 0.4 grams PM per kg of product pellatized/shredded and deposited  
 into storage.

Uncontrolled Emission Factor:  
 (0.4 g PM/1 kg product) \* (0.002205 lb PM/g PM) \* (1 kg product/2.2046 lb product) = 0.0004 lb PM/lb product

Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr) = (500 lbs rubber/hr) \* (0.0004 lb PM/lb rubber) = 0.20 lbs/hr\*  
 Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr) = (0.2 lbs/hr) \* (8760 hr/yr) \* (ton/2000 lbs) = 0.88 tons/yr\*

**B. Calcium Carbonate Emissions**

Emission factor used is for crushing calcium carbonate (CaCO3) from AP-42 Chapter 11.4 (Calcium Carbide Manufacturing)  
 Table 11.4-2, which is 0.11 lb PM/ton material and assumes fabric filter controls with a 99.8% control efficiency

Uncontrolled PM Emission Factor:  
 (0.11 lb PM/ton CaCO3) \* (1 ton CaCO3/2000 lbs CaCO3) / (1 - 0.998) = 0.0275 lb PM/lb CaCO3

Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr) = (30 lbs CaCO3/hr) \* (0.0275 lb PM/lb CaCO3) = 0.825 lbs/hr\*  
 Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr) = (0.825 lbs/hr) \* (8760 hr/yr) \* (ton/2000 lbs) = 3.61 tons/yr\*

**C. Total Emissions from Rubber Shredding (Vulcanator) and Calcium Carbonate**

Total Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr) = (0.20 lbs/hr) + (0.825 lbs/hr) = 1.03 lbs/hr\*  
 Total Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr) = (0.88 tons/yr) + (3.61 tons/yr) = 4.49 tons/yr\*

|   |              |
|---|--------------|
| <b>Cartridge Filter Control Efficiency =</b>                | <b>90.0%</b> |
| <b>Total Controlled Potential to Emit (PTE) (lbs/hr) =</b>  | <b>0.10</b>  |
| <b>Total Controlled Potential to Emit (PTE) (tons/yr) =</b> | <b>0.45</b>  |

\*PM10 and PM2.5 emissions assumed equal to PM10 emissions for both shredding and crushing

**326 IAC 6-3-2 Allowable PM Emission Rate**

| Process    | Control          | Process Weight Rate (lbs/hr)* | Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr) | Uncontrolled PTE of PM (lb/hr) | Controlled PTE of PM (lb/hr) |
|------------|------------------|-------------------------------|-------------------------------|---|--------------------------------|------------------------------|
| Vulcanator | Cartridge Filter | 530                           | 0.265                         | 1.68  | 1.03                           | 0.10                         |

**Methodology**

\*Based on information provided by the source.

Process Weight Rate (lbs/hr) = [Weight of Boards Processed (lbs/board)] \* [Maximum Production Rate (boards/hr)]

Process Weight Rate (tons/hr) = [Process Weight Rate (lbs/hr)] \* [ton/2000 lbs]

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Protecta Drive Tooling Gel and Resin Operations (Mold Booth #1)**

Company Name: Alpha Systems, Inc.  
Address City IN Zip: 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
Permit Number: F039-30703-00504  
Reviewer: Christine L. Filutze  
Date: April 23, 2012

**Mold Booth #1**

**Gel Coat Spray Booth**

| Material        | Density (Lb/Gal) | Weight % Styrene Monomer | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Material Usage (lb/hour) | Material Usage (gal/day) | CFA Unified Emission Factor (lb/ton)* | Potential VOC/HAP pounds per hour | Potential Pounds of VOC/HAP per day | Potential VOC/HAP tons per year | Particulate PM/PM10/PM2.5** (ton/yr) | Transfer Efficiency |
|-----------------|------------------|--------------------------|------------------------|---------------------|--------------------------|--------------------------|---------------------------------------|-----------------------------------|-------------------------------------|---------------------------------|--------------------------------------|---------------------|
| Tooling Gelcoat | 9.10             | 46.00%                   | 0.250                  | 0.13                | 0.284                    | 0.750                    | 564.00                                | 0.08                              | 1.92                                | 0.35                            | 0.24                                 | 65%                 |

**Resin Spray Booth**

| Material      | Density (Lb/Gal) | Weight % Styrene Monomer | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Material Usage (lb/hour) | Material Usage (gal/day) | CFA Unified Emission Factor (lb/ton)* | Potential VOC/HAP pounds per hour | Potential Pounds of VOC/HAP per day | Potential VOC/HAP tons per year | Particulate PM/PM10/PM2.5** (ton/yr) | Transfer Efficiency |
|---------------|------------------|--------------------------|------------------------|---------------------|--------------------------|--------------------------|---------------------------------------|-----------------------------------|-------------------------------------|---------------------------------|--------------------------------------|---------------------|
| Tooling Resin | 9.26             | 50.00%                   | 2.250                  | 0.13                | 2.604                    | 6.750                    | 180.00                                | 0.23                              | 5.63                                | 1.03                            | 0.57                                 | 90%                 |

**Miscellaneous Surface Coating**

| Material       | Density (Lb/Gal) | Weight % VOC | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Material Usage (lb/hour) | Material Usage (gal/day) |  | Potential VOC pounds per hour | Potential Pounds of VOC per | Potential VOC tons per year | Particulate PM/PM10/PM2.5** (ton/yr) | Transfer Efficiency |
|----------------|------------------|--------------|------------------------|---------------------|--------------------------|--------------------------|--|-------------------------------|-----------------------------|-----------------------------|--------------------------------------|---------------------|
| Duratec Primer | 10.77            | 15.13%       | 0.1250                 | 0.125               | 0.168                    | 0.375                    |  | 0.03                          | 0.61                        | 0.11                        | 0.06                                 | 90%                 |

|  |                |
|--|----------------|
| Total PTE of VOC (tons/year)           | 1.49           |
| Total PTE of HAP (tons/year)           | 1.38 (styrene) |
| Total PTE of PM/PM10/PM2.5 (tons/year) | 0.87           |

**METHODOLOGY**

\*Emission factors are based on Composite Fabricators Association (CFA) Unified Emission Factors, July 23, 2001.

\*\*PM10 and PM2.5 emissions assumed equal to PM emissions

Material Usage (lb/hour) = [Density (lb/gal)] \* [Gal of Mat. (gal/unit)] \* [Maximum (unit/hour)]

Material Usage (gal/day) = [Gal of Mat. (gal/unit)] \* [Maximum (unit/hour)] \* [24 hours/day]

Gel Coat and Resin:

Potential VOC/HAP pounds per hour (lbs/hr) = [Material Usage (lb/hour)] \* [CFA Unified Emission Factor (lb/ton)] \* [ton/2000 lbs]

Miscellaneous Surface Coating:

Potential VOC pounds per hour (lbs/hr) = [Material Usage (lb/hour)] \* [Weight % VOC]

Potential VOC or HAP tons per day (tpy) = (VOC lbs/hr) \* (24 hrs/day)

Potential VOC or HAP tons per year (tpy) = (VOC lbs/hr) \* (8760 hrs/yr) \* (ton/2000 lbs)

Potential PM tons per year (tpy) = [Density (lb/gal)] \* [Gal of Mat. (gal/unit)] \* [Maximum (unit/hour)] \* [1 - Weight % VOC] \* [1 - Transfer Efficiency] \* [8760 hrs/yr] \* [1 ton/2000 lbs]

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Protecta Drive Skylights Glue Line**

Company Name: Alpha Systems, Inc.  
Address City IN Zip: 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
Permit Number: F039-30703-00504  
Reviewer: Christine L. Filutze  
Date: April 23, 2012

**Maximum Potential VOC Emissions Associated With Surface Coating - 8,760 hours per year - Adhesive = Polycarbonate Skylight Adhesive**

| 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) | Material Usage (lb/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 | Potential PM/PM10/PM2.5* (ton/yr) | lb VOC/gal solids | Transfer Efficiency** |
|-------------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|--------------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|-----------------------------------|-------------------|-----------------------|
| Skylight Adhesive | 12.77            | 84.92%                             | 0.00%          | 84.92%            | 0.00%          | 15.08%                          | 0.0005                 | 37.70               | 0.24                     | 10.84                                       | 10.84                            | 0.20                          | 4.91                         | 0.90                        | 0.00                              | 71.91             | 100.00%               |
| <b>Totals</b>     |                  |                                    |                |                   |                |                                 |                        |                     |                          |   |                                  | <b>0.20</b>                   | <b>0.90</b>                  | <b>0.00</b>                 |                                   |                   |                       |

**Hazardous Air Pollutants (HAPs)**

| Material          | Material Usage (lb/hour) | Weight % Methylene Chloride | PTE of Methylene Chloride (tons/yr) | PTE of Total HAPs (tons/yr) |
|-------------------|--------------------------|-----------------------------|-------------------------------------|-----------------------------|
| Skylight Adhesive | 0.24                     | 84.92%                      | 0.90                                | 0.90                        |

**Methodology**

\*PM10 and PM2.5 emissions assumed equal to PM emissions

\*\*Materials are applied using flow coating

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/h)

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

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 lb)

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

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

**Appendix A: Process Particulate Emissions  
Extrusion Compounding Line Loading Activities**

**Company Name:** Alpha Systems, Inc.  
**Address City IN Zip:** 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
**Permit Number:** F039-30703-00504  
**Reviewer:** Christine L. Filutze  
**Date:** April 23, 2012

**PTE of PM/PM10/PM2.5 (tons/year)**

| Process | Dust Collector Outlet Grain Loading (grains/acf) | Dust Collector Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> ) | Dust Collector Total Filter Area (ft <sup>2</sup> ) | Dust Collector Control Efficiency | Uncontrolled PTE of PM/PM10/PM2.5* (lbs/hr) | Uncontrolled PTE of PM/PM10/PM2.5* (tons/yr) | Controlled PTE of PM/PM10/PM2.5* (lbs/hr) | Controlled PTE of PM/PM10/PM2.5* (tons/yr) |
|---------|--|--|---|-----------------------------------|---|--|---|--|
| ECL1    | 0.00072  | 3.8  | 195   | 99.00%                            | 0.46  | 2.02   | 0.0046                                    | 0.02                                       |

**Methodology**

\*PM10 and PM2.5 emissions assumed equal to PM emissions

Uncontrolled Potential Emission (lbs/hr) = [Outlet Grain Loading (grains/acf)] \* [Air to Cloth Ratio (acfm/ft<sup>2</sup>)] \* [Filter Area (ft<sup>2</sup>)] \* [lb/7,000 grains] \* [60 min/hr] \* [1/(1-Control Efficiency)]

Uncontrolled Potential Emission (tons/yr) = Uncontrolled Potential Emission (lbs/hr) \* [8760 hr/yr] \* [ton/2,000 lbs]

Controlled Potential Emission (lbs/hr) = [Uncontrolled Potential Emission (lbs/hr)] \* [1 - Control Efficiency]

Controlled Potential Emission (tons/yr) = [Uncontrolled Potential Emission (tons/yr)] \* [1 - Control Efficiency]

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Alpha Systems, Inc.  
**Address City IN Zip:** 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
**Permit Number:** F039-30703-00504  
**Reviewer:** Christine L. Filutze  
**Date:** April 23, 2012

|                                 |                       |                                 |
|---------------------------------|-----------------------|---------------------------------|
| Heat Input Capacity<br>MMBtu/hr | HHV<br>mmBtu<br>mmscf | Potential Throughput<br>MMCF/yr |
| 12.8                            | 1020                  | 109.9                           |

| Unit ID              | MMBtu/hr    |                     |
|----------------------|-------------|---------------------|
| C1 thru C9           | 1.8         | (0.2 MMBtu/hr each) |
| TH-001 thru TH-010   | 1.0         | (0.1 MMBtu/hr each) |
| OVN-001 thru OVN-004 | 10.0        | (2.5 MMBtu/hr each) |
| <b>Total:</b>        | <b>12.8</b> |                     |

| Emission Factor in lb/MMCF    | Pollutant |       |               |      |                    |      |      |
|-------------------------------|-----------|-------|---------------|------|--------------------|------|------|
|                               | PM*       | PM10* | direct PM2.5* | SO2  | NOx                | VOC  | CO   |
|                               | 1.9       | 7.6   | 7.6           | 0.6  | 100<br>**see below | 5.5  | 84   |
| Potential Emission in tons/yr | 0.10      | 0.42  | 0.42          | 0.03 | 5.50               | 0.30 | 4.62 |

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

PM2.5 emission factor is filterable and condensable PM2.5 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/1,020 MMBtu

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

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 HAPs Emissions**

**Company Name:** Alpha Systems, Inc.  
**Address City IN Zip:** 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
**Permit Number:** F039-30703-00504  
**Reviewer:** Christine L. Filutze  
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| HAPs - Organics               |                    |                            |                         |                |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|----------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.80 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 1.2E-04            | 6.6E-05                    | 4.1E-03                 | 0.099          | 1.9E-04            |

| HAPs - Metals                 |                 |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 2.7E-05         | 6.0E-05            | 7.7E-05             | 2.1E-05              | 1.2E-04           |

**Total: 0.10**

Methodology is the same as previous page.

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 next page for Greenhouse Gas calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Greenhouse Gas Emissions**

**Company Name:** Alpha Systems, Inc.  
**Address City IN Zip:** 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
**Permit Number:** F039-30703-00504  
**Reviewer:** Christine L. Filutze  
**Date:** April 23, 2012

|                                       | Greenhouse Gas |      |      |
|---------------------------------------|----------------|------|------|
|                                       | CO2            | CH4  | N2O  |
| Emission Factor in lb/MMcf            | 120,000        | 2.3  | 2.2  |
| Potential Emission in tons/yr         | 6,596          | 0.13 | 0.12 |
| Summed Potential Emissions in tons/yr | 6,596          |      |      |
| CO2e Total in tons/yr                 | 6,636          |      |      |

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.  
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  
Woodworking and Plastics Machining Area**

**Company Name:** Alpha Systems, Inc.  
**Address City IN Zip:** 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
**Permit Number:** F039-30703-00504  
**Reviewer:** Christine L. Filutze  
**Date:** April 23, 2012

**Uncontrolled PTE of PM/PM10/PM2.5\***

| Process            | Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr)** | Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)** |
|--------------------|--|---|
| Woodworking        | 0.048  | 0.210   |
| Plastics Machining | 0.500  | 2.190   |
| <b>Totals</b>      | <b>0.548</b>                                 | <b>2.400</b>                                  |

**Methodology**

\*Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr) based on emission calculations contained in Minor Permit Revision No. 039-11874-00504, issued March 30, 2000.

\*\*PM2.5 emissions assumed equal to PM10 emissions.

Emissions (tons/yr) = Emissions (lbs/hr) x (8,760 hours/year) / (2,000 lbs/ton)

**326 IAC 6-3-2 Allowable PM Emission Rate**

| Process                            | Process Weight Rate (lbs/hr)* | Process Weight Rate (tons/hr) | 326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr) | Uncontrolled PTE of PM (lb/hr) |
|------------------------------------|-------------------------------|-------------------------------|---|--------------------------------|
| Woodworking and Plastics Machining | 350.0                         | 0.175                         | 1.28  | 0.548                          |

**Methodology**

\*The process weight rate correspondes to platics machining, which is the worst case process weight rate.

Process Weight Rate (lbs/hr) = [Weight of Boards Processed (lbs/board)] \* [Maximum Production Rate (boards/hr)]

Process Weight Rate (tons/hr) = [Process Weight Rate (lbs/hr)] \* [ton/2000 lbs]

**Appendix A: Emissions Calculations  
Storage Tanks**

**Company Name:** Alpha Systems, Inc.  
**Address City IN Zip:** 5120 Beck Dr & 21680 Protecta Dr, Elkhart, IN 46516  
**Permit Number:** F039-30703-00504  
**Reviewer:** Christine L. Filutze  
**Date:** April 23, 2012

| Storage Tank                 | PTE of VOC/HAP (vinyl acetate)<br>(lbs/year)* |                |                | PTE of VOC/HAP (vinyl acetate)<br>(tons/year)* |                |             |
|------------------------------|---|----------------|----------------|--|----------------|-------------|
|                              | Working Loss                                  | Breathing Loss | Total          | Working Loss                                   | Breathing Loss | Total       |
| T-5 Vertical Fixed Roof Tank | 317.79  | 132.06         | 449.85         | 0.159  | 0.066          | 0.22        |
| T-6 Vertical Fixed Roof Tank | 79.86   | 131.92         | 211.78         | 0.040  | 0.066          | 0.11        |
| T-7 Vertical Fixed Roof Tank | 125.9   | 133.61         | 259.51         | 0.063  | 0.067          | 0.13        |
| T-8 Vertical Fixed Roof Tank | 125.9   | 132.58         | 258.48         | 0.063  | 0.066          | 0.13        |
| <b>Totals</b>                |   |                | <b>1179.62</b> |  |                | <b>0.59</b> |

\*PTE of VOC/HAP (vinyl acetate) based on emission calculations contained in First Significant Permit Revision No. 039-12282-00504, issued December 4, 2006. The storage tank emission calculations are estimated using U.S. EPA's Emission Factor and Inventory Group TANKS Version 4.0 software program.



# 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:** David Young  
Alpha Systems, Inc.  
5120 Beck Drive  
Elkhart, IN 46516

**DATE:** June 5, 2012

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

**SUBJECT:** Final Decision  
FESOP Renewal  
039-30703-00504

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:  
Doug Elliott – D & B Environmental Services, Inc.  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

June 5, 2012

TO: Elkhart Public Library

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

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

**Applicant Name: Alpha Systems, Inc.**  
**Permit Number: 039-30703-00504**

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

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

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

|                            |   |   |   |  |
|----------------------------|---|---|---|--|
| IDEM Staff                 | GHOTOPP 6/5/2012<br>Alpha Systems, Inc 039-30703-00504 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    |                | David Young Alpha Systems, Inc 5120 Beck Dr Elkhart IN 46516 (Source CAATS) via confirmed delivery     |         |                 |                            |               |                 |          |          |          |                |         |
| 2    |                | Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)       |         |                 |                            |               |                 |          |          |          |                |         |
| 3    |                | Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)                                    |         |                 |                            |               |                 |          |          |          |                |         |
| 4    |                | Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)               |         |                 |                            |               |                 |          |          |          |                |         |
| 5    |                | Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)            |         |                 |                            |               |                 |          |          |          |                |         |
| 6    |                | Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant) |         |                 |                            |               |                 |          |          |          |                |         |
| 7    |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 8    |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 9    |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 10   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 11   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 12   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 13   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 14   |                |  |         |                 |                            |               |                 |          |          |          |                |         |
| 15   |                |  |         |                 |                            |               |                 |          |          |          |                |         |

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