



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 12, 2012

RE: ACCESSA Coating Solutions/039-31155-00717

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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**New Source Construction
and Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY**

**ACCESSA Coating Solutions
28255 Charlotte Avenue, Building 4
Elkhart, Indiana 46517**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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.: F039-31155-00717	
Issued by: <i>Nathan Bell for IC</i> Iryn Galilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 12, 2012 Expiration Date: March 12, 2017

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary, industrial water and solvent based coating products manufacturing plant.

Source Address:	28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
General Source Phone Number:	(330) 231-2931
SIC Code:	2851 (Paint, Varnishes, Lacquers, Enamels and Allied Services), 5198 (Paint, Varnishes and Supplies)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) One (1) mixer, identified as Mixer A, approved in 2012 for construction, including one (1) 1,200 gallon blender, identified as Blender 1, approved in 2012 for construction, with a maximum capacity of 328,500 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing one batch per day, using no control devices, and exhausting indoors.
- (b) Two (2) mixers, identified as Mixer B1 and Mixer B2, approved in 2012 for construction, including:
 - (1) One (1) 500 gallon blender, identified as Blender 2, approved in 2012 for construction, with a maximum capacity of 970,900 gallons per year, processing 7 batches per day, using no control devices, and exhausting indoors.
 - (2) One (1) 400 gallon blender, identified as Blender 3, approved in 2012 for construction, with a maximum capacity of 219,000 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 2 batches per day, using no control devices, and exhausting indoors.
- (c) Three (3) mixers, identified as Mixer C1, Mixer C2, and Mixer C3, approved in 2012 for construction, including:
 - (1) One (1) 125 gallon blender, identified as Blender 6, approved in 2012 for construction, with a maximum capacity of 80,300 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 4 batches per day, using no control devices, and exhausting indoors.

- (2) Three (3) 55 gallon drum blenders, identified as Blender 4, approved in 2012 for construction, with a combined maximum capacity of 80,300 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 4 batches per day, using no control devices, and exhausting indoors.
- (3) Four (4) 10 gallon vat blenders, identified as Blender 7, approved in 2012 for construction, with a combined maximum capacity of 7,300 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 2 batches per day, using no control devices, and exhausting indoors.
- (d) Four (4) mixers, identified as Mixer D1, Mixer D2, Mixer D3, and Mixer D4, approved in 2012 for construction, including four (4) 5 gallon pail tabletop blenders, identified as Blender 5, approved in 2012 for construction, with a combined maximum capacity of 54,750 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 30 batches per day, using no control devices, and exhausting indoors.

The coating manufacturing operations are batch processes. Only one blending operation can support a corresponding mixer at any given time. Process equipment must be cleaned between formulations.

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

This stationary source also includes the following insignificant activities:

- (a) Three (3) parts washers, approved for construction in 2012, with a combined maximum capacity of 145 gallons per year, using no control devices, and exhausting indoors. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) One (1) laboratory consisting of one (1) small tabletop spray booth used for quality control (color matching), approved for construction in 2012, using dry filters for PM control, and exhausting through stack LAB. [326 IAC 8-1]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4] [326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when the following requirements are met:

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

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

- (a) This permit, F039-31155-00717, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)]

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

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

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

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

The Permittee shall implement the PMPs.

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

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F039-31155-00717 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.16 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

B.19 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

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

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

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

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

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

B.20 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) 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.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 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.23 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.24 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.25 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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]

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

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) mixer, identified as Mixer A, approved in 2012 for construction, including one (1) 1,200 gallon blender, identified as Blender 1, approved in 2012 for construction, with a maximum capacity of 328,500 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing one batch per day, using no control devices, and exhausting indoors.
- (b) Two (2) mixers, identified as Mixer B1 and Mixer B2, approved in 2012 for construction, including:
 - (1) One (1) 500 gallon blender, identified as Blender 2, approved in 2012 for construction, with a maximum capacity of 970,900 gallons per year, processing 7 batches per day, using no control devices, and exhausting indoors.
 - (2) One (1) 400 gallon blender, identified as Blender 3, approved in 2012 for construction, with a maximum capacity of 219,000 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 2 batches per day, using no control devices, and exhausting indoors.
- (c) Three (3) mixers, identified as Mixer C1, Mixer C2, and Mixer C3, approved in 2012 for construction, including:
 - (1) One (1) 125 gallon blender, identified as Blender 6, approved in 2012 for construction, with a maximum capacity of 80,300 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 4 batches per day, using no control devices, and exhausting indoors.
 - (2) Three (3) 55 gallon drum blenders, identified as Blender 4, approved in 2012 for construction, with a combined maximum capacity of 80,300 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 4 batches per day, using no control devices, and exhausting indoors.
 - (3) Four (4) 10 gallon vat blenders, identified as Blender 7, approved in 2012 for construction, with a combined maximum capacity of 7,300 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 2 batches per day, using no control devices, and exhausting indoors.
- (d) Four (4) mixers, identified as Mixer D1, Mixer D2, Mixer D3, and Mixer D4, approved in 2012 for construction, including four (4) 5 gallon pail tabletop blenders, identified as Blender 5, approved in 2012 for construction, with a combined maximum capacity of 54,750 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 30 batches per day, using no control devices, and exhausting indoors.

The coating manufacturing operations are batch processes. Only one blending operation can support a corresponding mixer at any given time. Process equipment must be cleaned between formulations.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.1.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

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

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC input to Blender 2 shall be limited such that the VOC emissions from Blender 2 shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC input to Blender 5 shall be limited such that the VOC emissions from Blender 5 shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The VOC input to Blender 7 shall be limited such that the VOC emissions from Blender 7 shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these VOC emission limits shall limit the VOC emissions from Blender 2, Blender 5, and Blender 7, to less than twenty-five (25) tons per twelve (12) consecutive month period, each. Therefore the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) are not applicable to Blender 2, Blender 5, or Blender 7.

D.1.5 FESOP Emissions Limitations and PSD Minor Limit [326 IAC 2-8-4] [326 IAC 2-2]

The total VOC input to Blenders 1 through 7 shall be limited such that the total VOC emissions shall not exceed 85.55 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

D.1.6 HAP Minor Limits [326 IAC 2-4.1] [40 CFR 63]

- (a) HAP 2-butoxyethanol emissions from Blender 2 shall be limited to 7.54 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) HAP glycol ethers emissions from Blender 2 shall be limited to 8.61 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Total HAP emissions from Blender 2 shall be limited to 12.46 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the HAP emission limits in (a), (b), and (c), combined with the potential to emit single and combined HAPs from other emission units at the source, shall limit the HAP emissions from the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP and less than twenty-five (25) tons per twelve (12) consecutive month period for total HAP. Therefore the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) and 326 IAC 2-7 (Part 70 Permit Program) are not applicable to the entire source, and the source is rendered an area source of HAP emissions under 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants).

D.1.7 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the mixing operations shall not exceed 0.551 pounds per hour.

Compliance Determination Requirements

D.1.8 VOC Emissions

The Permittee shall use the following equation to determine compliance with the VOC emission limitations in Conditions D.1.4 and D.1.5:

$$E = \sum \frac{\left(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \frac{days}{year} \right)}{2000 \frac{lb}{ton} \times 12 \frac{months}{year}}$$

Where:

- E = Total VOC Emissions, ton/month
- N_i = Number of like units for the blending operation
- B_i = Batch Size, gal/batch
- C_{in-i} = VOC input to blending and mixing operations, lb/gal
- C_{out-i} = VOC Content of coating formulation, lb/gal
- T_i = Batch Processing Time, batches/day

D.1.9 HAP Emissions

The Permittee shall use the following equation to determine compliance with the HAP emission limitations in Condition D.1.6:

$$E = \sum \frac{\left(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \frac{days}{year} \right)}{2000 \frac{lb}{ton} \times 12 \frac{months}{year}}$$

Where:

E = Total HAP Emissions, ton/month

N_j = Number of like units for the blending operation

B_j = Batch Size, gal/batch

C_{in-i} = HAP input to blending and mixing operations, lb/gal

C_{out-i} = HAP Content of coating formulation, lb/gal

T_j = Batch Processing Time, batches/day

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.4 and D.1.5.
- (1) The VOC content of each solvent used; and
 - (2) The VOC usage for each month.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.6.
- (1) The single HAP and combined HAPs contents of each solvent used;
 - (2) The total combined HAP usage for each month; and
 - (3) The total single HAP usage for each month.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.4, D.1.5, and D.1.6, 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. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (i) Three (3) parts washers, approved for construction in 2011, with a combined maximum capacity of 145 gallons per year, using no control devices, and exhausting indoors.
[326 IAC 8-3-2] [326 IAC 8-3-5]

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

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

D.2.4 Cold Cleaner Operation [326 IAC 8-3-2]

For each cold cleaning facility, the Permittee shall:

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

D.2.5 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

- (a) For each cold cleaner degreaser facility, the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) For each cold cleaning facility, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (j) One (1) laboratory consisting of one (1) small tabletop spray booth used for quality control (color matching), approved for construction in 2012, using dry filters for PM control, and exhausting through stack LAB. [326 IAC 8-1]

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.3.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.3.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.3.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

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

D.3.4 Volatile Organic Compounds (VOC) Emissions [326 IAC 8-1]

The VOC usage for the surface coating laboratory shall be less than fifteen (15) pounds per day.

Compliance with this limit will restrict the VOC emissions from the surface coating laboratory to less than fifteen (15) pounds per day. Therefore, pursuant to 326 IAC 8-1-1(b), the requirements of 326 IAC 8-1 will not apply to the surface coating laboratory.

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

D.3.5 Record Keeping Requirements

- (a) To document the compliance status with the VOC emission limit in Condition D.3.4, the Permittee shall maintain daily records for the total VOC usage for the surface coating laboratory. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit in Condition D.3.4:

- (1) The amount and VOC content of each coating material, dilution solvent, and cleanup solvent used for each day. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.
 - (2) The total VOC usage for each day.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the record keeping required by this condition.

D.3.6 Reporting Requirements

A monthly summary of the information to document the compliance status with Condition D.3.4 shall be submitted, using the reporting form located at the end of this permit, or its equivalent, no later than thirty (30) days after the end of the month being reported. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT CERTIFICATION

Source Name: ACCESSA Coating Solutions
Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
FESOP Permit No.: F039-31155-00717

<p>This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.</p>
<p>Please check what document is being certified:</p>
<p><input type="checkbox"/> Annual Compliance Certification Letter</p>
<p><input type="checkbox"/> Test Result (specify): _____</p>
<p><input type="checkbox"/> Report (specify): _____</p>
<p><input type="checkbox"/> Notification (specify): _____</p>
<p><input type="checkbox"/> Affidavit (specify): _____</p>
<p><input type="checkbox"/> Other (specify): _____</p>

<p>I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.</p>
<p>Signature: _____</p>
<p>Printed Name: _____</p>
<p>Title/Position: _____</p>
<p>Phone: _____</p>
<p>Date: _____</p>

**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
EMERGENCY OCCURRENCE REPORT**

Source Name: ACCESSA Coating Solutions
Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
FESOP Permit No.: F039-31155-00717

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/>	This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance and Enforcement Branch); and• The Permittee must submit notice in writing or by facsimile no later than two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.
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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? <input type="checkbox"/> Y <input type="checkbox"/> N Describe:
Type of Pollutants Emitted: <input type="checkbox"/> TSP <input type="checkbox"/> PM-10 <input type="checkbox"/> SO ₂ <input type="checkbox"/> VOC <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> 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: ACCESSA Coating Solutions
 Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
 FESOP Permit No.: F039-31155-00717
 Facility: Blender 2
 Pollutant: VOC Emissions
 Limit: 24.9 tons per year with compliance determined at the end of each month

$$E = \sum \frac{(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \text{ days/year})}{2000 \text{ lb/ton} \times 12 \text{ mo./yr}}$$

Where:
 E = Total VOC Emissions, ton/month
 N_i = Number of like units for the blending operation
 B_i = Batch Size, gal/batch
 C_{in-i} = VOC input to blending and mixing operations, lb/gal
 C_{out-i} = VOC Content of coating formulation, lb/gal
 T_i = Batch Processing Time, batches/day

QUARTER: _____ **YEAR:** _____

Month	VOC Emissions for This Month (tons)	VOC Emissions for Previous 11 Months (tons)	VOC Emissions for 12-Month Period (tons)

- No deviation occurred in this quarter.
 Deviations 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: ACCESSA Coating Solutions
 Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
 FESOP Permit No.: F039-31155-00717
 Facility: Blender 5
 Pollutant: VOC Emissions
 Limit: 24.9 tons per year with compliance determined at the end of each month

$$E = \sum \frac{(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \text{ _ days / year})}{2000 \text{ _ lb / ton} \times 12 \text{ _ mo. / yr}}$$

Where:
 E = Total VOC Emissions, ton/month
 N_i = Number of like units for the blending operation
 B_i = Batch Size, gal/batch
 C_{in-i} = VOC input to blending and mixing operations, lb/gal
 C_{out-i} = VOC Content of coating formulation, lb/gal
 T_i = Batch Processing Time, batches/day

QUARTER: _____ **YEAR:** _____

Month	VOC Emissions for This Month (tons)	VOC Emissions for Previous 11 Months (tons)	VOC Emissions for 12-Month Period (tons)

- No deviation occurred in this quarter.
 Deviations 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: ACCESSA Coating Solutions
 Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
 FESOP Permit No.: F039-31155-00717
 Facility: Blender 7
 Pollutant: VOC Emissions
 Limit: 24.9 tons per year with compliance determined at the end of each month

$$E = \sum \frac{(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \text{ days/year})}{2000 \text{ lb/ton} \times 12 \text{ mo./yr}}$$

Where:
 E = Total VOC Emissions, ton/month
 N_i = Number of like units for the blending operation
 B_i = Batch Size, gal/batch
 C_{in-i} = VOC input to blending and mixing operations, lb/gal
 C_{out-i} = VOC Content of coating formulation, lb/gal
 T_i = Batch Processing Time, batches/day

QUARTER: _____ **YEAR:** _____

Month	VOC Emissions for This Month (tons)	VOC Emissions for Previous 11 Months (tons)	VOC Emissions for 12-Month Period (tons)

- No deviation occurred in this quarter.
 Deviations 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: ACCESSA Coating Solutions
 Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
 FESOP Permit No.: F039-31155-00717
 Facility: All Blending/Mixing Operations
 Pollutant: VOC Emissions
 Limit: 85.55 tons per year with compliance determined at the end of each month

$$E = \sum \frac{(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \text{ days/year})}{2000 \text{ lb/ton} \times 12 \text{ mo./yr}}$$

Where:
 E = Total VOC Emissions, ton/month
 N_i = Number of like units for the blending operation
 B_i = Batch Size, gal/batch
 C_{in-i} = VOC input to blending and mixing operations, lb/gal
 C_{out-i} = VOC Content of coating formulation, lb/gal
 T_i = Batch Processing Time, batches/day

QUARTER: _____ **YEAR:** _____

Month	VOC Emissions for This Month (tons)	VOC Emissions for Previous 11 Months (tons)	VOC Emissions for 12-Month Period (tons)

- No deviation occurred in this quarter.
 Deviations 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: ACCESSA Coating Solutions
 Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
 FESOP Permit No.: F039-31155-00717
 Facility: Blender 2
 Pollutant: HAP 2-butoxyethanol Emissions
 Limit: 7.54 tons per year with compliance determined at the end of each month

$$E = \sum \frac{(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \text{ _days / year})}{2000 \text{ _lb / ton} \times 12 \text{ _mo. / yr}}$$

Where:
 E = Total HAP Emissions, ton/month
 N_i = Number of like units for the blending operation
 B_i = Batch Size, gal/batch
 C_{in-i} = HAP input to blending and mixing operations, lb/gal
 C_{out-i} = HAP Content of coating formulation, lb/gal
 T_i = Batch Processing Time, batches/day

QUARTER: _____ **YEAR:** _____

Month	HAP Emissions for This Month (tons)	HAP Emissions for Previous 11 Months (tons)	HAP Emissions for 12-Month Period (tons)

- No deviation occurred in this quarter.
 Deviations 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: ACCESSA Coating Solutions
 Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
 FESOP Permit No.: F039-31155-00717
 Facility: Blender 2
 Pollutant: HAP glycol ethers Emissions
 Limit: 8.61 tons per year with compliance determined at the end of each month

$$E = \sum \frac{(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \text{ _ days / year})}{2000 \text{ _ lb / ton} \times 12 \text{ _ mo. / yr}}$$

Where:
 E = Total HAP Emissions, ton/month
 N_i = Number of like units for the blending operation
 B_i = Batch Size, gal/batch
 C_{in-i} = HAP input to blending and mixing operations, lb/gal
 C_{out-i} = HAP Content of coating formulation, lb/gal
 T_i = Batch Processing Time, batches/day

QUARTER: _____ **YEAR:** _____

Month	HAP Emissions for This Month (tons)	HAP Emissions for Previous 11 Months (tons)	HAP Emissions for 12-Month Period (tons)

- No deviation occurred in this quarter.
 Deviations 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: ACCESSA Coating Solutions
 Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
 FESOP Permit No.: F039-31155-00717
 Facility: Blender 2
 Pollutant: Total HAP Emissions
 Limit: 12.46 tons per year with compliance determined at the end of each month

$$E = \sum \frac{(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \text{ _days / year})}{2000 \text{ _lb / ton} \times 12 \text{ _mo. / yr}}$$

Where:
 E = Total HAP Emissions, ton/month
 N_i = Number of like units for the blending operation
 B_i = Batch Size, gal/batch
 C_{in-i} = HAP input to blending and mixing operations, lb/gal
 C_{out-i} = HAP Content of coating formulation, lb/gal
 T_i = Batch Processing Time, batches/day

QUARTER: _____ **YEAR:** _____

Month	HAP Emissions for This Month (tons)	HAP Emissions for Previous 11 Months (tons)	HAP Emissions for 12-Month Period (tons)

- No deviation occurred in this quarter.
 Deviations 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**

Monthly Report

Source Name: ACCESSA Coating Solutions
Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
FESOP Permit No.: F039-31155-00717
Facility: Surface Coating Laboratory
Pollutant: VOC Usage
Limit: less than 15 pounds per day

MONTH: _____ YEAR: _____

Day	VOC Usage this day (ton/day)	Day	VOC Usage this day (ton/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

- No deviation occurred in this month.
- Deviations occurred in this month.
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
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ACCESSA Coating Solutions
Source Address: 28255 Charlotte Avenue, Building 4, Elkhart, Indiana 46517
FESOP Permit No.: F039-31155-00717

Months: _____ to _____ Year: _____

Page 1 of 2

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”.

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

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

ACCESSA Coating Solutions
28255 Charlotte Avenue, Building 4
Elkhart, IN 46517

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that ACCESSA Coating Solutions, located at 28255 Charlotte Avenue, Building 4, Elkhart, IN 46517, has constructed and will operate the stationary industrial water and solvent based coating products manufacturing plant in conformity with the requirements and intent of the permit application received by the Office of Air Quality on November 16, 2011, and as permitted pursuant to New Source Construction and Federally Enforceable State Operating Permit No.

F039-31155-00717, Plant ID No. 039-00717, issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20____. My Commission expires: _____.

Signature _____

Name _____
(typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name: ACCESSA Coating Solutions
Source Location: 28255 Charlotte Avenue, Building 4, Elkhart, IN 46517
County: Elkhart
SIC Code: 2851, 5198
Operation Permit No.: F039-31155-00717
Permit Reviewer: Kimberly Cottrell

Public Notice Information

On February 2, 2012, the Office of Air Quality (OAQ) had a notice published in Elkhart Truth in Elkhart, Indiana, stating that ACCESSA Coating Solutions had applied for a New Source Construction and Federally Enforceable State Operating Permit (FESOP) for a stationary, industrial water and solvent based coating products manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

IDEM Changes

IDEM did not receive any public comments on this permit; however, the OAQ has decided to make the following revisions to the permit:

Change No. 1:

On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The change is only to site of these rules in Section B - Operational Flexibility. IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

B.13 Preventative Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][~~326 IAC 2-8-5(a)(1)~~]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15 ~~(b) through (d)~~ **(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)(2), (c)(1), and (d)~~ **(b)(1) and (c)**.

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

Change No. 2:

IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. **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.

Change No. 3:

IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **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.

Quarterly Deviation and Compliance Monitoring Report

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".

IDEM Contact

Questions regarding this proposed permit can be directed to:

Kimberly Cottrell
Indiana Department Environmental Management
Office of Air Quality
100 North Senate Avenue
MC 61-53, Room 1003
Indianapolis, Indiana 46204-2251
Toll free (within Indiana): 1-800-451-6027 extension 3-0870
Or dial directly: (317) 233-0870
kcottrel@idem.in.gov

Please refer to New Source Construction and Federally Enforceable State Operating Permit (FESOP) No. F039-31155-00717 in all correspondence.

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

**Technical Support Document (TSD) for a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)**

Source Description and Location

Source Name:	ACCESSA Coating Solutions
Source Location:	28255 Charlotte Avenue, Building 4, Elkhart, IN 46517
County:	Elkhart
SIC Code:	2851, 5198
Operation Permit No.:	F039-31155-00717
Permit Reviewer:	Kimberly Cottrell

On November 16, 2011, the Office of Air Quality (OAQ) received an application from ACCESSA Coating Solutions related to the construction and operation of a new stationary industrial water and solvent based coating products manufacturing plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ 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 _{2.5} .	

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

- (b) **PM_{2.5}**
Elkhart County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ 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 CO, Pb, NO₂, PM₁₀, and SO₂. 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.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by ACCESSA Coating Solutions on November 16, 2011, relating to construction and operation of a new stationary industrial water and solvent based coating products manufacturing plant.

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

- (a) One (1) mixer, identified as Mixer A, approved in 2012 for construction, including one (1) 1,200 gallon blender, identified as Blender 1, approved in 2012 for construction, with a maximum capacity of 328,500 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing one batch per day, using no control devices, and exhausting indoors.
- (b) Two (2) mixers, identified as Mixer B1 and Mixer B2, approved in 2012 for construction, including:
- (1) One (1) 500 gallon blender, identified as Blender 2, approved in 2012 for construction, with a maximum capacity of 970,900 gallons per year, processing 7 batches per day, using no control devices, and exhausting indoors.
 - (2) One (1) 400 gallon blender, identified as Blender 3, approved in 2012 for construction, with a maximum capacity of 219,000 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 2 batches per day, using no control devices, and exhausting indoors.
- (c) Three (3) mixers, identified as Mixer C1, Mixer C2, and Mixer C3, approved in 2012 for construction, including:
- (1) One (1) 125 gallon blender, identified as Blender 6, approved in 2012 for construction, with a maximum capacity of 80,300 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 4 batches per day, using no control devices, and exhausting indoors.
 - (2) Three (3) 55 gallon drum blenders, identified as Blender 4, approved in 2012 for construction, with a combined maximum capacity of 80,300 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 4 batches per day, using no control devices, and exhausting indoors.

- (3) Four (4) 10 gallon vat blenders, identified as Blender 7, approved in 2012 for construction, with a combined maximum capacity of 7,300 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 2 batches per day, using no control devices, and exhausting indoors.
- (d) Four (4) mixers, identified as Mixer D1, Mixer D2, Mixer D3, and Mixer D4, approved in 2012 for construction, including four (4) 5 gallon pail tabletop blenders, identified as Blender 5, approved in 2012 for construction, with a combined maximum capacity of 54,750 gallons per year of solvent, additives, resin, stain, coating base, and polymer, processing 30 batches per day, using no control devices, and exhausting indoors.

The coating manufacturing operations are batch processes. Only one blending operation can support a corresponding mixer at any given time. Process equipment must be cleaned between formulations.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Four (4) natural gas fired ceiling heaters, approved in 2012 for construction, each with a heat input capacity of 0.15 MMBtu/hr, using no control devices, and exhausting indoors.
- (b) Three (3) parts washers, approved in 2012 for construction, with a combined maximum capacity of 145 gallons per year, using no control devices, and exhausting indoors.
- (c) One (1) laboratory consisting of one (1) small tabletop spray booth used for quality control (color matching), approved in 2012 for construction, using dry filters for PM control, and exhausting to stack LAB.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Unrestricted Potential Emissions

The following tables reflect the unrestricted potential emissions of the source.

Pollutant	Potential To Emit (tons/year)
CO	0.216
NO _x	0.258
PM	3.38
PM ₁₀ ⁽¹⁾	3.08
PM _{2.5}	3.02
SO ₂	0.002
VOC	660.34
GHG as CO ₂ e	311.06
HAP 2-butoxyethanol	76.72
HAP benzene	0.66
HAP ethylbenzene	1.69

HAP glycol ethers	44.14
HAP methanol	2.23
HAP toluene	0.99
HAP xylene	8.47
TOTAL HAPs	134.89

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), not particulate matter (PM), is considered as a "regulated air pollutant".

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V levels. Therefore, the Permittee will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHG) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (d) 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.

Potential to Emit After Issuance

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/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	CO	NO _x	PM	PM ₁₀ *	Direct PM _{2.5}	SO ₂	VOC	GHG as CO ₂ e	Single HAP	Total HAPs
Blender 1 - 1200 gallon mixing tank	-	-	0.362	0.362	0.362	-	85.55	-	-	-
Blender 2 - 500 gallon mixing tank	-	-	0.242	0.242	0.242	0		-	7.54 2-butoxy ethanol	12.46
Blender 3 - 400 gallon mixing tank	-	-	-	-	-	-		-	-	-
Blender 6 - 125 gallon mixing tank	-	-	0.089	0.089	0.089	0		-	2.24 2-butoxy ethanol	3.68
Blender 4 - 55 gallon drums (3)	-	-	-	-	-	-		-	-	-
Blender 7 - 10 gallon vats (4)	-	-	-	-	-	-	-	-	-	
Blender 5 - 5 gallon pails (4)	-	-	0.048	0.048	0.048	-	-	-	0.41 xylene	0.59
Cleaning Operations	-	-	-	-	-	-	6.41	-	3.85 xylene	7.55

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	CO	NO _x	PM	PM ₁₀ [*]	Direct PM _{2.5}	SO ₂	VOC	GHG as CO ₂ e	Single HAP	Total HAPs
Painting Lab	-	-	2.24	2.24	2.24	-	7.41	-	-	-
Combustion Units (4)	0.216	0.258	0.005	0.020	0.020	0.002	0.01	311.06	4.6e-3 hexane	4.86E- 03
Parts Washers (3)	-	-	-	-	-	-	0.52	-	0.31 xylene	0.61
Paved Roads	-	-	0.3883	0.0777	0.0191	-	-	-	-	-
Total PTE of Entire Source	0.216	0.258	3.38	3.08	3.02	0.002	99.90	311.06	9.90	24.90
Title V Major Source Thresholds	100	100	NA	100	100	100	100	100,000	10	25
PSD Major Source Thresholds	100	100	100	100	100	100	100	100,000	NA	NA

*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".

FESOP Status

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The total VOC input to Blenders 1 through 7 shall be limited such that the total VOC emissions shall not exceed 85.55 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this VOC emission limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable to the entire source.

- (2) HAP Limits
 - (A) HAP 2-butoxyethanol emissions from Blender 2 shall be limited to 7.54 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (B) HAP glycol ethers emissions from Blender 2 shall be limited to 8.61 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (C) Total HAP emissions from Blender 2 shall be limited to 12.46 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these HAP emission limits, combined with the potential to emit single and combined HAPs from other emission units at the source, shall limit the HAP emissions from the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP and less than twenty-five (25) tons per twelve (12) consecutive month period for total HAP. Therefore the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) and 326 IAC 2-7 (Part 70 Permit Program) are not applicable to the entire source, and the source is rendered an area source of HAP emissions under 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants).

Federal Rule Applicability Determination

40 CFR 60 (New Source Performance Standards (NSPS))

The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since the ceiling heaters do not have a maximum design heat input capacity greater than or equal to 2.9 MW (10 MMBtu/hr).

40 CFR 63 (National Emission Standards for Hazardous Air Pollutants (NESHAP))

- (1) The source-wide potential to emit of single HAP is greater than ten (10) tons per year and the potential to emit of total HAPs is greater than twenty-five (25) tons per year. Therefore, this source has elected to take enforceable limits on HAP emissions to be considered an area source under Section 112 of the Clean Air Act (CAA). Compliance with the following limits will render the source an area source of hazardous air pollutants (HAP) emissions:
 - (a) HAP 2-butoxyethanol emissions from Blender 2 shall be limited to 7.54 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (b) HAP glycol ethers emissions from Blender 2 shall be limited to 8.61 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (c) Total HAP emissions from Blender 2 shall be limited to 12.46 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these HAP emission limits, combined with the potential to emit single and combined HAPs from other emission units at the source, shall limit the HAP emissions from the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP and less than twenty-five (25) tons per twelve (12) consecutive month period for total HAP. Therefore the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) and 326 IAC 2-7 (Part 70 Permit Program) are not applicable to the entire source, and the source is rendered an area source of HAP emissions under 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants).

- (2) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included in the permit, because this source is an area source of hazardous air pollutants (HAP) emissions and because the surface coating occurs at research or laboratory facilities.
- (3) The requirements of the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing, 40 CFR 63, Subpart HHHHH (326 IAC 20-88), are not included in the permit, because this source is an area source of hazardous air pollutants (HAP) emissions.
- (4) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit, because:

- (A) the source does not perform any paint stripping operations;
- (B) the facility does not perform autobody refinishing;
- (C) the spray application of coatings does not contain any of the target HAPs (chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)); and
- (D) the surface coating operations meet the definition of “research and laboratory activities” and/or “quality control activities” in §63.11180.

Quality control activities means surface coating or paint stripping activities that meet all of the following criteria:

- (1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- (2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.
- (3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.
- (4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Research and laboratory activities means surface coating or paint stripping activities that meet one of the following criteria:

- (1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.
 - (2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.
 - (3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.
- (5) The requirements of the National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources, 40 CFR 63, Subpart VVVVVV, are not included in the permit, because none of the process equipment will process, use, or generate materials containing the HAPs identified in Table 1 to Subpart VVVVVV of Part 63—Hazardous Air Pollutants Used To Determine Applicability of Chemical Manufacturing Operations.
 - (6) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing, 40 CFR 63, Subpart BBBB, are not included in the permit, because none of the process equipment will process, use, or generate materials containing Target HAP (chromium, lead, manganese, and nickel).
 - (7) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing, 40 CFR 63, Subpart CCCCCC (326 IAC 20-88), are not included in the permit, because none of the process equipment will process, use, or generate materials containing HAP, as defined in , 40 CFR 63.11607.

Material containing HAP means a material containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight, as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material. Benzene and methylene chloride are volatile HAP. Compounds of cadmium, chromium, lead and/or nickel are metal HAP.

40 CFR 64.2 (Compliance Assurance Monitoring (CAM))

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

State Rule Applicability - Entire Source

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

This new source is not a major stationary source under PSD (326 IAC 2-2) because the potential to emit VOC is limited to less than 100 tons per year (see the VOC Limit below under "326 IAC 2-8 (Federally Enforceable State Operating Permit Program)"), the potential to emit all other attainment regulated criteria pollutants are less than 100 tons per year, the potential to emit greenhouse gases (GHG) is less than the PSD threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions 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))

The source-wide potential to emit of single HAP is greater than ten (10) tons per year and the potential to emit of total HAPs is greater than twenty-five (25) tons per year. Therefore, this source has elected to take enforceable limits on HAP emissions to be considered an area source under Section 112 of the Clean Air Act (CAA). Compliance with the following limits will render the provisions of 326 IAC 2-4.1 not applicable to this source:

- (a) HAP 2-butoxyethanol emissions from Blender 2 shall be limited to 7.54 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) HAP glycol ethers emissions from Blender 2 shall be limited to 8.61 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Total HAP emissions from Blender 2 shall be limited to 12.46 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these HAP emission limits, combined with the potential to emit single and combined HAPs from other emission units at the source, shall limit the HAP emissions from the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP and less than twenty-five (25) tons per twelve (12) consecutive month period for total HAP. Therefore the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) and 326 IAC 2-7 (Part 70 Permit Program) are not applicable to the entire source, and the source is rendered an area source of HAP emissions under 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants).

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) Total VOC emissions from all blending and mixing operations shall be limited to 85.55 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this VOC emission limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable to the entire source.

- (2) HAP Limits

- (A) HAP 2-butoxyethanol emissions from Blender 2 shall be limited to 7.54 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (B) HAP glycol ethers emissions from Blender 2 shall be limited to 8.61 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (C) Total HAP emissions from Blender 2 shall be limited to 12.46 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these HAP emission limits, combined with the potential to emit single and combined HAPs from other emission units at the source, shall limit the HAP emissions from the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP and less than twenty-five (25) tons per twelve (12) consecutive month period for total HAP. Therefore the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) and 326 IAC 2-7 (Part 70 Permit Program) are not applicable to the entire source, and the source is rendered an area source of HAP emissions under 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants).

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Emission Units

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

Pursuant to 326 IAC 6-3-2(e)(2), the particulate matter (PM) from the mixing operations shall not exceed 0.551 pounds per hour because the process weight rate of each blender is less than one hundred (100) pounds per hour. Based on the potential to emit calculations for the mixing operations, no control device is not needed to comply with this limit.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

The source is subject to the requirements of 326 IAC 6-4, because the mixing operations have the potential to emit fugitive particulate emissions. 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 8-1 (Volatile Organic Compound (VOC) Rules)

The unlimited VOC potential emissions from the surface coating laboratory is limited to less than fifteen (15) pounds per day; therefore, the requirements of 326 IAC 8-1 will not apply to the surface coating laboratory.

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

Because the facility can use only one blending operation for each mixing operation, the applicability of 326 IAC 8-1-6 was evaluated at the blending operations.

The potential to emit VOC from Blender 1, Blender 3, Blender 4, and Blender 6, is less than twenty-five (25) tons per year, each. Therefore, the provisions of 326 IAC 8-1-6 not applicable to Blender 1, Blender 3, Blender 4, or Blender 6.

The potential to emit VOC from Blender 2, Blender 5, and Blender 7, is greater than twenty-five (25) tons per year, each. Therefore, this source has elected to take enforceable limits on VOC emissions. Compliance with the following limits will render the provisions of 326 IAC 8-1-6 not applicable to Blender 2, Blender 5, and Blender 7:

- (a) The VOC input to Blender 2 shall be limited such that the VOC emissions from Blender 2 shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC input to Blender 5 shall be limited such that the VOC emissions from Blender 5 shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The VOC input to Blender 7 shall be limited such that the VOC emissions from Blender 7 shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these VOC emission limits shall limit the VOC emissions from Blender 2, Blender 5, and Blender 7, to less than twenty-five (25) tons per twelve (12) consecutive month period, each. Therefore the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) are not applicable to Blender 2, Blender 5, or Blender 7.

326 IAC 8-3-2 (Cold Cleaner Operation) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The three (3) parts washers are considered cold cleaner degreasing units; therefore, the requirements of 326 IAC 8-3-2 (Cold Cleaner Operation) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) apply to the three (3) parts washers.

326 IAC 8-14 (Architectural and Industrial Maintenance (AIM) Coatings)

This source is not subject to the requirements for Architectural and Industrial Maintenance (AIM) Coatings in 326 IAC 8-14 because they will not manufacture AIM coatings for use within the state of Indiana. The facility will sell coating products that could be classified as conversion varnishes, stains, etc. None of the products are sold directly to an application that falls under the definition of Architectural Coatings or Industrial Maintenance Coatings. All of the facility's coating products will be sold to customers to be used in OEM environments as part of the manufacturing process for finished goods (e.g., kitchen cabinets, doors, trim packages, industrial OEM applications, etc.). The coatings to be manufactured by ACCESSA will not be applied on-site to a fixed structure or appurtenance, but rather to actual goods for sales by end customers.

Compliance Determination, Monitoring and Testing Requirements

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.

(a) The compliance determination requirements applicable to this source as follows:

- (1) The Permittee shall use the following equation to determine compliance with the VOC emission limitations:

$$E = \sum \frac{\left(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \frac{\text{days}}{\text{year}} \right)}{2000 \frac{\text{lb}}{\text{ton}} \times 12 \frac{\text{months}}{\text{year}}}$$

Where:

E = Total VOC Emissions, ton/month

N_j = Number of like units for the blending operation

B_j = Batch Size, gal/batch

C_{in-i} = VOC input to blending and mixing operations, lb/gal

C_{out-i} = VOC Content of coating formulation, lb/gal

T_j = Batch Processing Time, batches/day

- (2) The Permittee shall use the following equation to determine compliance with the HAP emission limitations:

$$E = \sum \frac{\left(N_i \times B_i \times (C_{in-i} - C_{out-i}) \times T_i \times 365 \frac{\text{days}}{\text{year}} \right)}{2000 \frac{\text{lb}}{\text{ton}} \times 12 \frac{\text{months}}{\text{year}}}$$

Where:

E = Total HAP Emissions, ton/month

N_i = Number of like units for the blending operation

B_i = Batch Size, gal/batch

C_{in-i} = HAP input to blending and mixing operations, lb/gal

C_{out-i} = HAP Content of coating formulation, lb/gal

T_i = Batch Processing Time, batches/day

- (b) There are no compliance monitoring requirements applicable to this source.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 16, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F039-31155-00717. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Kimberly Cottrell at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0870 or toll free at 1-800-451-6027 extension 3-0870.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

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

Appendix A – Emission Calculations
Technical Support Document (TSD)
New Source Construction and Federally Enforceable State Operating Permit

Source Description and Location

Company Name: ACCESSA Coating Solutions
Address City IN Zip: 28255 Charlotte Avenue, Building 4, Elkhart, IN 46517
County: Elkhart
SIC / NAICS Code: 2851 5198
Permit Number: F039-31155-00717
Permit Reviewer: Kimberly Cottrell
Date: January 27, 2012

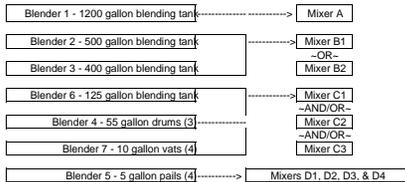
Summary of Potential to Emit

The tables below summarize the potential to emit calculations submitted by ACCESSA Coating Solutions. The subsequent pages of this document contain the calculations provided by ACCESSA Coating Solutions. IDEM has reviewed these calculations and verified their accuracy.

		Unrestricted Potential Emissions (ton/yr)																								
	Emission Unit	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	GHGs as CO ₂ e	2-butoxy-ethanol	benzene	cadmium	chromium	dichloro-benzene	ethyl-benzene	formal-dehyde	glycol ethers	hexane	lead	manga-nese	methanol	nickel	toluene	xylene	Total HAP	
Mixer A	Blender 1 - 1200 gallon blending tank	-	-	0.362	0.362	0.362	-	16.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Mixers B1 & B2	Blender 2 - 500 gallon blending tank	-	-	0.214	0.214	0.214	-	477.36	-	74.35	0.58	-	-	-	0.87	-	42.85	-	-	-	-	-	-	3.79	122.44	
	Blender 3 - 400 gallon blending tank	-	-	0.242	0.242	0.242	-	19.62	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Mixers C1, C2 & C3	Blender 6 - 125 gallon blending tank	-	-	0.089	0.089	0.089	-	4.09	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Blender 4 - 55 gallon drums (3)	-	-	0.053	0.053	0.053	-	11.47	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Mixers D1-D4	Blender 7 - 10 gallon vats (4)	-	-	0.006	0.006	0.006	-	57.43	-	2.24	0.02	-	-	-	0.03	-	1.29	-	-	-	-	-	-	0.11	3.68	
	Blender 5 - 5 gallon pails (4)	-	-	0.048	0.048	0.048	-	60.03	-	-	0.06	-	-	-	0.09	-	-	-	-	-	-	-	0.03	0.41	0.59	
	Cleaning Operations	-	-	-	-	-	-	6.41	-	0.118	-	-	-	-	0.64	-	-	-	-	-	2.06	-	0.88	3.85	7.55	
	Painting Lab	-	-	2.24	2.24	2.24	-	7.41	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Combustion Units	0.216	0.258	0.005	0.020	0.020	0.002	0.01	311.06	-	5.41E-06	2.83E-06	3.61E-06	3.09E-06	-	1.93E-04	-	4.64E-03	1.29E-06	9.79E-07	-	5.41E-06	8.76E-06	-	4.86E-03	
	Parts Washers	-	-	-	-	-	-	0.52	-	0.00948	-	-	-	-	0.05	-	-	-	-	-	0.17	-	0.07	0.31	0.61	
	Paved Roads	-	-	0.3883	0.0777	0.0191	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Totals	0.216	0.258	3.65	3.36	3.30	0.002	660.34	311.06	76.72	0.66	2.83E-06	3.61E-06	3.09E-06	1.69	1.93E-04	44.14	4.64E-03	1.29E-06	9.79E-07	2.23	5.41E-06	0.99	8.47	134.89	
Part 70 Major Source Threshold		100	100	100	100	100	100	100	100,000	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	25

		Limited Potential Emissions (ton/yr)																							
	Emission Unit	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	GHGs as CO ₂ e	2-butoxy-ethanol	benzene	cadmium	chromium	dichloro-benzene	ethyl-benzene	formal-dehyde	glycol ethers	hexane	lead	manga-nese	methanol	nickel	toluene	xylene	Total HAP
Mixer A	Blender 1 - 1200 gallon blending tank	-	-	0.362	0.362	0.362	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Mixers B1 & B2	Blender 2 - 500 gallon blending tank	-	-	0.214	0.214	0.214	-	-	-	7.54	0.58	-	-	-	0.87	-	8.61	-	-	-	-	-	-	3.79	12.46
	Blender 3 - 400 gallon blending tank	-	-	0.242	0.242	0.242	-	85.55	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Mixers C1, C2 & C3	Blender 6 - 125 gallon blending tank	-	-	0.089	0.089	0.089	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Blender 4 - 55 gallon drums (3)	-	-	0.053	0.053	0.053	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Mixers D1-D4	Blender 7 - 10 gallon vats (4)	-	-	0.006	0.006	0.006	-	-	-	2.24	0.02	-	-	-	0.03	-	1.29	-	-	-	-	-	-	0.11	3.68
	Blender 5 - 5 gallon pails (4)	-	-	0.048	0.048	0.048	-	-	-	-	0.06	-	-	-	0.09	-	-	-	-	-	-	-	0.03	0.41	0.59
	Cleaning Operations	-	-	-	-	-	-	6.41	-	0.118	-	-	-	-	0.64	-	-	-	-	-	2.06	-	0.88	3.85	7.55
	Painting Lab	-	-	2.24	2.24	2.24	-	7.41	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Combustion Units	0.216	0.258	0.005	0.020	0.020	0.002	0.01	311.06	-	5.41E-06	2.83E-06	3.61E-06	3.09E-06	-	1.93E-04	-	4.64E-03	1.29E-06	9.79E-07	-	5.41E-06	8.76E-06	-	4.86E-03
	Parts Washers	-	-	-	-	-	-	0.52	-	0.00948	-	-	-	-	0.05	-	-	-	-	-	0.17	-	0.07	0.31	0.61
	Paved Roads	-	-	0.3883	0.0777	0.0191	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Totals	0.216	0.258	3.65	3.36	3.30	0.002	99.90	311.06	9.90	0.66	2.83E-06	3.61E-06	3.09E-06	1.69	1.93E-04	9.90	4.64E-03	1.29E-06	9.79E-07	2.23	5.41E-06	0.99	8.47	24.90

Process Flow:



VOC Limits: Blender 2, Blender 5, and Blender 7

$$E = \sum N_i \times B_i \times (C_{mix} - C_{out}) \times T_i \times 365 \text{ day/yr}$$

2000 lb/ton

where: E = Total VOC Emissions, ton/month

N_i = Number of like units for the blending operation
B_i = Batch Size, gal/batch
C_{in} = VOC input to blending and mixing operations, lb/gal
C_{out} = VOC Content of coating formulation, lb/gal
T_i = Batch Processing Time, batches/day

HAP Limits for Blender 2 (Mixer B) will follow similar methodology.

Notes:

For PM, PM₁₀, PM_{2.5}, and VOC, only the worst case emissions potential for each mixing line is included for the Total PTE.

**The worst-case single HAP for the facility (i.e., the HAP emitted in greatest quantities) is 2-butoxyethanol.

**The Unrestricted PTE for VOC and HAP exceeds the Part 70 Thresholds; therefore, ACCESSA is accepting federally enforceable limits to be a synthetic minor source.

Coating Formulations

Formula 1 (solvent-based coating)				VOC Info			HAP Info													
Component	Density (lb/gal)	Weight of Component in Batch (lb)	Volume of Component in Batch (gal)	Weight % VOC	Volume % VOC	VOC Quantity (lb/gal)	Weight % 2-Butoxy-ethanol	Weight % Benzene	Weight % Ethyl-benzene	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	2-Butoxy-ethanol Quantity (lb/gal)	Benzene Quantity (lb/gal)	Ethyl-benzene Quantity (lb/gal)	Glycol Ethers Quantity (lb/gal)	Toluene Quantity (lb/gal)	Xylene Quantity (lb/gal)	Total HAP Quantity (lb/gal)	
Solvent Blend	6.40	5.601	0.875	100.00%	100.00%	5.60	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 1	7.40	0.235	0.032	68.92%	68.92%	0.16	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Resin Solution	7.60	0.076	0.010	42.77%	42.77%	0.032	0%	0%	0.28%	0%	0%	0%	0	0	2.12E-04	0	0	0	0	2.12E-04
Additive 2	8.76	0.056	0.006	2.0%	2.0%	0.0011	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 3 (dry)	7.60	0.044	0.006	0%	0%	0	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Formulation Total:	6.01	6.01	1.00	96.42%	90.15%	5.80	0%	0%	0.28%	0%	0%	0%	0	0	2.12E-04	0	0	0	0	2.12E-04

Formula 2 (water-based coating)				VOC Info			HAP Info													
Component	Density (lb/gal)	Weight of Component in Batch (lb)	Volume of Component in Batch (gal)	Weight % VOC	Volume % VOC	VOC Quantity (lb/gal)	Weight % 2-Butoxy-ethanol	Weight % Benzene	Weight % Ethyl-benzene	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	2-Butoxy-ethanol Quantity (lb/gal)	Benzene Quantity (lb/gal)	Ethyl-benzene Quantity (lb/gal)	Glycol Ethers Quantity (lb/gal)	Toluene Quantity (lb/gal)	Xylene Quantity (lb/gal)	Total HAP Quantity (lb/gal)	
Emulsion Polymer	8.90	6.413	0.721	0.18%	0.18%	0.01	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 1	7.51	0.278	0.037	100%	100%	0.278	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 2	9.59	0.021	0.002	100%	100%	0.021	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 3	7.59	0.010	0.001	0.0004%	0.0004%	3.84E-08	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 4	8.01	0.086	0.011	5.0%	5.0%	0.004	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Formulation Total:	6.81	6.81	1.00	4.63%	4.11%	0.31	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0

* Formula 2 does not include any dry ingredients.

Formula 3 (solvent-based coating)				VOC Info			HAP Info													
Component	Density (lb/gal)	Weight of Component in Batch (lb)	Volume of Component in Batch (gal)	Weight % VOC	Volume % VOC	VOC Quantity (lb/gal)	Weight % 2-Butoxy-ethanol	Weight % Benzene	Weight % Ethyl-benzene	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	2-Butoxy-ethanol Quantity (lb/gal)	Benzene Quantity (lb/gal)	Ethyl-benzene Quantity (lb/gal)	Glycol Ethers Quantity (lb/gal)	Toluene Quantity (lb/gal)	Xylene Quantity (lb/gal)	Total HAP Quantity (lb/gal)	
Solvent Blend	6.79	6.127	0.902	93.2%	93.2%	5.71	2.5%	0%	0%	0%	0%	0%	0.15	0	0	0	0	0	0	0.15
Additive 1	7.40	0.068	0.009	68.92%	68.92%	0.05	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Resin Solution	7.60	0.173	0.023	42.77%	42.77%	0.074	0%	0%	0.28%	0%	0%	0%	0	0	4.85E-04	0	0	0	0	4.85E-04
Additive 2	8.76	0.043	0.005	2.0%	2.0%	0.0009	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 3 (dry)	7.60	0.034	0.004	0%	0%	0	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Formulation Total:	6.45	6.45	1.00	90.48%	85.73%	5.83	2.50%	0%	0.28%	0%	0%	0%	0.15	0	4.85E-04	0	0	0	0	0.15

Formula 4 (solvent-based coating)				VOC Info			HAP Info													
Component	Density (lb/gal)	Weight of Component in Batch (lb)	Volume of Component in Batch (gal)	Weight % VOC	Volume % VOC	VOC Quantity (lb/gal)	Weight % 2-Butoxy-ethanol	Weight % Benzene	Weight % Ethyl-benzene	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	2-Butoxy-ethanol Quantity (lb/gal)	Benzene Quantity (lb/gal)	Ethyl-benzene Quantity (lb/gal)	Glycol Ethers Quantity (lb/gal)	Toluene Quantity (lb/gal)	Xylene Quantity (lb/gal)	Total HAP Quantity (lb/gal)	
Stain Base	6.49	2.005	0.309	87.29%	87.29%	1.75	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Solvent	6.34	6.000	0.947	100.00%	100.00%	6.00	0%	0.02%	0.03%	0%	0.01%	0.13%	0	1.20E-03	1.80E-03	0	0	0	7.80E-03	1.14E-02
Formulation Total:	8.01	8.01	1.00	96.82%	121.63%	7.75	0%	0.02%	0.03%	0%	0.01%	0.13%	0	1.20E-03	1.80E-03	0	0	0	7.80E-03	1.14E-02

* Formula 4 does not include any dry ingredients.

Coating Formulations

Formula 5 (solvent-based coating)				VOC Info				HAP Info												
Component	Density (lb/gal)	Weight of Component in Batch (lb)	Volume of Component in Batch (gal)	Weight % VOC	Volume % VOC	VOC Quantity (lb/gal)	Weight % 2-Butoxy-ethanol	Weight % Benzene	Weight % Ethyl-benzene	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	2-Butoxy-ethanol Quantity (lb/gal)	Benzene Quantity (lb/gal)	Ethyl-benzene Quantity (lb/gal)	Glycol Ethers Quantity (lb/gal)	Toluene Quantity (lb/gal)	Xylene Quantity (lb/gal)	Total HAP Quantity (lb/gal)	
Solvent Blend	6.82	6.580	0.965	100.00%	100.00%	6.58	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Stain Base	7.02	0.221	0.031	5.00%	5.00%	0.01	0%	0%	0%	40.0%	0%	0%	0	0	0	0	0.09	0	0	0.09
Formulation Total:	6.80	6.80	1.00	96.92%	96.62%	6.59	0%	0%	0%	40.00%	0%	0%	0	0	0	0.09	0	0	0.09	

* Formula 5 does not include any dry ingredients.

Formula 6 (solvent-based coating)				VOC Info				HAP Info												
Component	Density (lb/gal)	Weight of Component in Batch (lb)	Volume of Component in Batch (gal)	Weight % VOC	Volume % VOC	VOC Quantity (lb/gal)	Weight % 2-Butoxy-ethanol	Weight % Benzene	Weight % Ethyl-benzene	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	2-Butoxy-ethanol Quantity (lb/gal)	Benzene Quantity (lb/gal)	Ethyl-benzene Quantity (lb/gal)	Glycol Ethers Quantity (lb/gal)	Toluene Quantity (lb/gal)	Xylene Quantity (lb/gal)	Total HAP Quantity (lb/gal)	
Solvent 1	6.46	2.75	0.425	100%	100%	2.75	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 1	7.40	0.22	0.030	68.92%	68.92%	0.15	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Solvent 2	6.34	2.85	0.450	100%	100%	2.85	0%	0.02%	0.03%	0%	0.01%	0.13%	0	5.71E-04	8.56E-04	0	2.85E-04	3.71E-03	5.42E-03	
Additive 2	7.52	0.37	0.049	100%	100%	0.37	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 3	8.76	0.15	0.018	2.0%	2.0%	0.0031	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 4 (dry)	7.60	0.03	0.004	0%	0%	0	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Formulation Total:	6.38	6.38	1.00	96.04%	94.60%	6.13	0%	0.02%	0.03%	0%	0.01%	0.13%	0	5.71E-04	8.56E-04	0	2.85E-04	3.71E-03	5.42E-03	

Formula 7 (water-based coating)				VOC Info				HAP Info												
Component	Density (lb/gal)	Weight of Component in Batch (lb)	Volume of Component in Batch (gal)	Weight % VOC	Volume % VOC	VOC Quantity (lb/gal)	Weight % 2-Butoxy-ethanol	Weight % Benzene	Weight % Ethyl-benzene	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	2-Butoxy-ethanol Quantity (lb/gal)	Benzene Quantity (lb/gal)	Ethyl-benzene Quantity (lb/gal)	Glycol Ethers Quantity (lb/gal)	Toluene Quantity (lb/gal)	Xylene Quantity (lb/gal)	Total HAP Quantity (lb/gal)	
Coating Base	6.82	6.88	1.008	69.24%	69.24%	4.76	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Additive 1 (dry)	7.60	0.22	0.029	0%	0%	0	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	0
Formulation Total:	7.10	7.10	1.00	67.09%	69.81%	4.76	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	

Notes:

Each Formulation Volume = 1 gallon

Methodology:

- Volume of Component in Batch (gal) = Weight of Component in Batch (lb) / Density of Component (lb/gal)
- VOC Quantity of Component (lb/gal) = Weight of Component in Batch (lb) x Weight % VOC / Formulation Volume (1 gal)
- HAP Quantity of Component (lb/gal) = Weight of Component in Batch (lb) x Weight % HAP / Formulation Volume (1 gal)
- Formulation Weight (lb) = Σ Weight of Component in Batch (lb)
- Formulation Density (lb/gal) = Formulation Weight (lb) / Formulation Volume (gal)
- Formulation Weight % VOC = Σ [Component Weight % VOC x Weight of Component in Batch (lb)] / Formulation Weight (lb)
- Formulation Volume % VOC = Σ [Component Volume % VOC x Volume of Component in Batch (gal)] / Formulation Volume (gal)
- Formulation VOC Quantity (lb/gal) = Formulation Density (lb/gal) x Formulation Weight % VOC
- Formulation HAP Quantity (lb/gal) = Formulation Density (lb/gal) x Formulation Weight % HAP

Coating Formulation Summary

Worst-Case Material	VOC Content Initial (lb/gal)	VOC Content Final (lb/gal)	VOC Content Change (lb/gal)	Single HAP Content Initial (lb/gal)	Single HAP Content Final (lb/gal)	Single HAP Content Change (lb/gal)	Total HAP Content Initial (lb/gal)	Total HAP Content Final (lb/gal)	Total HAP Content Change (lb/gal)	Maximum Quantity - Dry Raw Materials (lb/gal)
Formula 1	5.797	5.667	0.130	2.125E-04	0	2.125E-04	2.125E-04	0	2.125E-04	0.044
Formula 2	0.315	0.136	0.179	0	0	0	0	0	0	0
Formula 3	5.832	5.753	0.079	1.532E-01	0	1.532E-01	1.536E-01	0	1.536E-01	0.034
Formula 4	7.750	6.767	0.983	7.800E-03	0	7.800E-03	1.140E-02	0	1.140E-02	0
Formula 5	6.591	6.153	0.438	8.826E-02	0	8.826E-02	8.826E-02	0	8.826E-02	0
Formula 6	6.130	5.993	0.137	8.565E-04	0	8.565E-04	5.424E-03	0	5.424E-03	0.033
Formula 7	4.76	4.753	0.01	0	0	0	0	0	0	0.221

Notes:

Initial Content is based upon the weight and associated VOC and HAP content of the various raw material ingredients making up the worst-case formulation.
 Final Content is based upon the associated VOC content of the final product packaged and shipped off-site to customers.
 Content Change is the difference between the VOC Content Initial minus the VOC Content Final and is assumed to represent the VOC emissions from the process.
 Maximum Quantity of Dry Raw Materials is the quantity of dry materials (matting agents) added to the formulation.
 Note that tints and pigments are added to various formulations as paste-like material which does not generate PM emissions.

Blending Process Summary

Process	Formulations Processed						
	Formula 1	Formula 2	Formula 3	Formula 4	Formula 5	Formula 6	Formula 7
Blender 1 - 1200 gallon blending tank		X					
Blender 2 - 500 gallon blending tank	X		X	X	X		
Blender 3 - 400 gallon blending tank		X					
Blender 6 - 125 gallon blending tank							X
Blender 4 - 55 gallon drums (3)							X
Blender 7 - 10 gallon vats (4)	X		X	X	X		
Blender 5 - 5 gallon pails (4)						X	X

Notes:

Formulations processed for each Mixing process is provided by ACCESSA Coating Solutions.

HAP Emissions from Blending Operations

Unrestricted PTE								
Process	# of Like Units	Processing Time (batches/day)	Batch Size (gal/batch)	Maximum Usage (gal/yr)	Worst Case Single HAP Content Change (lb/gal)	Worst Case Total HAP Content Change (lb/gal)	Single HAP Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Blender 1 - 1200 gallon blending tank	1	1	900	328,500	NA	NA	0	0
Blender 2 - 500 gallon blending tank	1	7	380	970,900	0.153	0.154	74.35	74.59
Blender 3 - 400 gallon blending tank	1	2	300	219,000	NA	NA	0	0
Blender 6 - 125 gallon blending tank	1	4	55	80,300	NA	NA	0	0
Blender 4 - 55 gallon drums (3)	3	4	55	240,900	NA	NA	0	0
Blender 7 - 10 gallon vats (4)	4	2	10	29,200	0.153	0.154	2.24	2.24
Blender 5 - 5 gallon pails (4)	4	30	5	219,000	0.001	0.005	0.09	0.59
							76.59	77.43

Methodology:

Processing Time and Batch Size provided by ACCESSA Coating Solutions.

Maximum Usage is based upon the Processing Time and Batch Size provided by ACCESSA Coating Solutions.

Worst-Case Material is the coating product made in this tank that has the highest HAP content per the various formulations mixed/blended at the facility.

HAP Emissions (tons/yr) = HAP Content (lbs/gal) x Maximum Usage (gals/yr) x (1 ton/2,000 lbs)

VOC & PM Emissions from Blending Operations

Unrestricted PTE										
Process	Worst Case VOC Content Change (lb/gal)	VOC Emissions (lb/hr)	VOC Emissions (lb/day)	VOC Emissions (ton/yr)	Maximum Quantity of Dry Raw Materials (lb/gal)	PM Emission Factor (lb/ton)	PM Emissions (lb/hr)	PM Emissions (lb/day)	PM Emissions (ton/yr)	326 IAC 6-3-2: E (lb/hr)
Blender 1 - 1200 gallon blending tank	0.179	0.08	0.0806	0.015	0.221	20	1.9859	1.9859	0.362	0.551
Blender 2 - 500 gallon blending tank	0.983	0.19	1.3078	477.36	0.044	20	0.1676	1.1729	0.214	0.551
Blender 3 - 400 gallon blending tank	0.179	0.03	0.0538	19.62	0.221	20	0.6620	1.3240	0.242	0.551
Blender 6 - 125 gallon blending tank	0.01	0.00027	0.0011	0.401	0.221	20	0.1214	0.4855	0.089	0.551
Blender 4 - 55 gallon drums (3)	0.01	0.00082	0.0033	3.61	0.044	20	0.0728	0.2910	0.053	0.551
Blender 7 - 10 gallon vats (4)	0.98	0.02	0.0393	57.43	0.044	20	0.0176	0.0353	0.006	0.551
Blender 5 - 5 gallon pails (4)	0.137	0.00137	0.0411	60.03	0.044	20	0.0088	0.2646	0.048	0.551
		0.32	1.53	560.62			3.04	5.56	1.01	

Methodology:

VOC Emissions (lb/hr) = # Like Units x Batch Size (gals/batch) x Worst Case VOC Content Change (lb/gal) x (1 ton/2000 lbs)

VOC Emissions (lb/day) = VOC Emissions (lb/batch) x Process Time (batches/day)

VOC Emissions (tons/yr) = VOC Emissions (lb/day) x 365 days/yr / 2000 lb/ton

PM Emission Factor obtained from AP-42 Chapter 6.4, Table 6.4-1

PM Emissions (lb/hr) = # Like Units x Batch Size (gals/batch) x Max Quantity of Dry Materials (lbs/gal) x (1 ton/2000 lbs) x PM EF (lbs/ton)

PM Emissions (lb/day) = PM Emissions (lb/batch) x Process Time (batches/day)

PM Emissions (tons/yr) = PM Emissions (lb/day) x 365 days/yr / 2000 lb/ton

Unrestricted PTE					
Process	Maximum Quantity of Product (ton/yr)	VOC Emission Factor (lb/ton product)	VOC Emissions (lb/hr)	VOC Emissions (lb/day)	VOC Emissions (ton/yr)
Blender 1 - 1200 gallon blending tank	1,066	30	87.65	87.65	16.00
Blender 2 - 500 gallon blending tank	4,230	30	49.66	347.64	63.44
Blender 3 - 400 gallon blending tank	738	30	30.33	60.67	11.07
Blender 6 - 125 gallon blending tank	272	30	5.60	22.40	4.09
Blender 4 - 55 gallon drums (3)	765	30	15.72	62.86	11.47
Blender 7 - 10 gallon vats (4)	94	30	3.85	7.70	1.40
Blender 5 - 5 gallon pails (4)	922	30	2.53	75.79	13.83
			195.33	664.70	121.31

VOC Emissions (ton/yr)
0.015
477.36
19.62
0.401
3.61
57.43
60.03
618.47

from above

Worst Case Emissions (ton/yr)
16.00
477.36
19.62
4.09
11.47
57.43
60.03
645.99

Methodology

Maximum Quantity of Product (ton/yr) = # like units x Processing Time (batches/day) x Batch Size (gal/batch) x Formulation Density (lb/gal) x 365 (days/yr) / 2000 lb/ton

VOC Emission Factor obtained from AP-42 Chapter 6.4, Table 6.4-1

VOC Emissions (ton/yr) = Maximum Quantity of Product (ton/yr) x VOC Emission Factor (lb/ton product) / 2000 lb/ton

VOC Emissions (lb/day) = VOC Emissions (ton/yr) x 2000 lb/ton / 365 (days/yr)

VOC Emissions (lb/hr) = VOC Emissions (lb/day) x Processing Time (Batches/day)

Cleaning Solvent Usage

VOC/HAP Emissions:				VOC Info		HAP Info									
Solvents	Density (lb/gal)	Actual Usage (gals/yr)	Maximum Usage (gals/yr)	Weight % VOC	VOC Emissions (tons/yr)	Weight % 2-Butoxy-ethanol	Weight % Ethyl-benzene	Weight % Methanol	Weight % Toluene	Weight % Xylene	2-Butoxy-ethanol Emissions (tons/yr)	Ethyl-benzene Emissions (tons/yr)	Methanol Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylene Emissions (tons/yr)
Methyl Ethyl Ketone (MEK)	6.71	600	1,800	100%	6.04	0%	0%	0%	0%	0%	0	0	0	0	0
Thinner 219 (DT5910)	7.13	600	1,800	100%	6.41	0%	10.0%	0%	0%	60.0%	0	0.64	0	0	3.85
Klean Strip Lacquer Thinner	6.54	600	1,800	100%	5.89	2.0%	0%	35.0%	15.0%	0%	0.12	0	2.06	0.88	0
Acetone	6.60	600	1,800	0%	0	0%	0%	0%	0%	0%	0	0	0	0	0
Worst Case Solvent:					6.41						0.12	0.64	2.06	0.88	3.85

Total Combined HAPs: 6.79

Notes:

The facility requests the flexibility to utilize multiple cleaning solvents; therefore, the potential emissions are based upon the worst case solvent for each pollutant assuming maximum annual usage applies to each solvent.

Actual Usage is based upon the estimated annual usage quantities supplied by the facility for all cleaning solvents combined (assuming each solvent can have 100% of the maximum annual usage).

Maximum Usage is based upon the actual usage rate multiplied by a safety factor of 3 to represent a maximum potential production scenario.

Acetone is considered an exempt VOC product.

Methodology

VOC/HAP Emissions (tons/yr) = Density (lbs/gal) x Maximum Usage (gals/yr) x Weight % VOC or HAP x 1 ton/2,000 lbs

Painting Laboratory

Coating	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water /Exempt	Weight % VOC	Weight % Solids	Volume % Volatile (H ₂ O & Organics)	Volume % Water	Volume % VOC	Volume % Solids	Gal of Mat. (gal/unit)	Actual (unit/day)	Maximum (unit/hr)	VOC Content (lb VOC /gal coating, less H ₂ O)	VOC Content (lb VOC /gal solids)	MAX. VOC Emissions (lb/day)	MAX. VOC Emissions (ton/yr)	PM Emissions (ton/yr)	Transfer Efficiency
Formula 1	6.49	87.29%	0%	87.29%	12.71%	90.15%	0%	90.15%	87.29%	0.25	1.0	1.0	5.67	6.49	34.00	6.21	0.23	75%
Formula 2	8.71	5.90%	4.35%	1.56%	94.10%	4.11%	3.02%	1.08%	5.90%	0.25	1.0	1.0	0.14	2.30	0.81	0.15	2.24	75%
Formula 3	6.74	90.96%	5.63%	85.34%	9.04%	85.73%	5.30%	80.42%	90.96%	0.25	1.0	1.0	5.75	6.32	34.52	6.30	0.17	75%
Formula 4	6.79	99.71%	0%	99.71%	0.29%	96.62%	0%	96.62%	99.71%	0.25	1.0	1.0	6.77	6.79	40.60	7.41	0.01	75%
Formula 5	6.35	96.91%	0%	96.91%	3.09%	121.63%	0%	121.63%	96.91%	0.25	1.0	1.0	6.15	6.35	36.92	6.74	0.05	75%
Formula 6	6.42	93.41%	0%	93.41%	6.59%	94.60%	0%	94.60%	93.41%	0.25	1.0	1.0	5.99	6.42	35.96	6.56	0.12	75%
Formula 7	8.42	68.44%	11.86%	56.58%	31.56%	69.81%	12.10%	57.72%	68.44%	0.25	1.0	1.0	4.76	6.96	28.59	5.22	0.73	75%
Potential Emissions															40.60	7.41	2.24	

METHODOLOGY

Transfer Efficiency = 75% as High Volume Low Pressure (HVLP) Application

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

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

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

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

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

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

These coatings do not contain HAP.

Natural Gas Combustion

Unit	Heat Input Capacity (MMBtu/hr)	Maximum Throughput (MMCF/yr)
Ceiling Heaters (4 @ 150,000 Btu/hr ea)	0.6	5.2

Pollutant	Emission Factor (lb/MMCF)	Emissions (ton/yr)
CO	84	0.216
NO _x	100	0.258
PM	1.9	0.005
PM ₁₀	7.6	0.020
PM _{2.5}	7.6	0.020
SO ₂	0.6	0.0015
VOC	5.5	0.0142

CO ₂	120,000	309.18
CH ₄	2.3	5.93E-03
N ₂ O	2.2	5.67E-03
GHG as CO ₂ e		311.06

GWP
 1
 21
 310

Benzene	0.0021	5.41E-06	<i>Organic HAP</i>
Dichlorobenzene	0.0012	3.09E-06	
Formaldehyde	0.075	1.93E-04	
Hexane	1.8	4.64E-03	
Toluene	0.0034	8.76E-06	
Cadmium	0.0011	2.83E-06	<i>HAP Metals</i>
Chromium	0.0014	3.61E-06	
Lead	0.0005	1.29E-06	
Manganese	0.00038	9.79E-07	
Nickel	0.0021	5.41E-06	
Combined HAPS		4.86E-03	

Notes:

These units are the employee comfort space heaters to be used at the new building in Elkhart.
 Heating value of natural gas assumed to be 1,020 Btu/scf
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4
 PM emission factor is filterable PM only.
 PM₁₀ emission factor is filterable and condensable PM₁₀ combined.
 PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.
 Emission Factors for NO_x: Uncontrolled = 100
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 The N₂O Emission Factor for uncontrolled is 2.2.
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Methodology

Maximum Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hr/yr x 1 CF/1,020 Btu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF) / 2,000 lb/ton
 CO₂e (tons/yr) = CO₂ (ton/yr) x CO₂ GWP + CH₄ (ton/yr) x CH₄ GWP + N₂O (ton/yr) x N₂O GWP

Degreasing - Parts Washers

VOC/HAP Emissions:			VOC Info		HAP Info									
Solvents	Density (lb/gal)	Maximum Usage (gals/yr)	Weight % VOC	VOC Emissions (tons/yr)	Weight % 2-Butoxy-ethanol	Weight % Ethyl-benzene	Weight % Methanol	Weight % Toluene	Weight % Xylene	2-Butoxy-ethanol Emissions (tons/yr)	Ethyl-benzene Emissions (tons/yr)	Methanol Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylene Emissions (tons/yr)
Methyl Ethyl Ketone (MEK)	6.71	145	100%	0.49	0%	0%	0%	0%	0%	0	0	0	0	0
Thinner 219 (DT5910)	7.13	145	100%	0.52	0%	10.0%	0%	0%	60.0%	0	0.05	0	0	0.31
Klean Strip Lacquer Thinner	6.54	145	100%	0.47	2.0%	0%	35.0%	15.0%	0%	0.01	0	0.17	0.07	0
Acetone	6.60	145	0%	0	0%	0%	0%	0%	0%	0	0	0	0	0
Worst Case Solvent:				0.52						0.01	0.05	0.17	0.07	0.31
													Total Combined HAPs: 0.55	

Notes:

The facility requests the flexibility to utilize multiple cleaning solvents; therefore, the potential emissions are based upon the worst case solvent for each pollutant assuming maximum annual usage applies to each solvent.

Maximum Usage is based upon the maximum allowable solvent usage for degreasing operations that are considered "insignificant" under 326 IAC 2-7-1(21)(K)(vi)(CC).

Acetone is considered an exempt VOC product.

Methodology

VOC/HAP Emissions (tons/yr) = Density (lbs/gal) x Maximum Usage (gals/yr) x Weight % VOC or HAP x 1 ton/2,000 lbs

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (ft/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (mi/day)	Maximum one-way miles (mi/yr)
Trucks (entering plant) (one-way trip)	3.0	1.0	3.0	40.0	120.0	500	0.095	0.3	103.7
Trucks (leaving plant) (one-way trip)	3.0	1.0	3.0	40.0	120.0	500	0.095	0.3	103.7
Totals			6.0		240.0			0.6	207.4

Average Vehicle Weight Per Trip =

40.0

 tons/trip
 Average Miles Per Trip =

0.09

 miles/trip

Abbreviations

PM = Particulate Matter
 PM₁₀ = Particulate Matter (<10 um)
 PM_{2.5} = Particle Matter (<2.5 um)
 PTE = Potential to Emit

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

	PM	PM ₁₀	PM _{2.5}	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads - Table 13.2.1-3)

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

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
 where p =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N =

365

 days per year

	PM	PM ₁₀	PM _{2.5}	
Unmitigated Emission Factor, Ef =	3.745	0.749	0.1838	lb/mile
Mitigated Emission Factor, Eext =	2.809	0.562	0.1379	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM ₁₀ (tons/yr)	Unmitigated PTE of PM _{2.5} (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM ₁₀ (tons/yr)	Mitigated PTE of PM _{2.5} (tons/yr)
Vehicle (entering plant) (one-way trip)	0.1942	0.0388	0.0095	0.1456	0.0291	0.0071
Vehicle (leaving plant) (one-way trip)	0.1942	0.0388	0.0095	0.1456	0.0291	0.0071
Totals	0.3883	0.0777	0.0191	0.2913	0.0583	0.0143

Methodology

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Les Yoder
ACCESSA Coating Solutions
28255 Charlotte Avenue, Building 4
Elkhart, IN 46517

DATE: March 12, 2012

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

SUBJECT: Final Decision
Federally Enforceable State Operating Agreement (FESOP)
039-31155-00717

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:
Joseph S. Todd, President, Responsible Official
Joseph VanCamp, Consultant
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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March 12, 2012

TO: Elkhart Public Library, Pierre Moran Branch

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

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

Applicant Name: ACCESSA Coating Solutions
Permit Number: 039-31155-00717

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	PWAY 3/12/2012 ACCESSA Coating Solutions 039-31155-00717 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Les Yoder ACCESSA Coating Solutions 28255 Charlotte Ave, Bldg 4 Elkhart IN 46517 (Source CAATS)										
2		Joseph S Todd President ACCESSA Coating Solutions 1034 East New York Street Indianapolis IN 46202 (RO CAATS)										
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
6		Mr. Joseph VanCamp Cornerstone Environmental, Health & Safety, Inc. 312 E Diamond St. Kendallville IN 46755 (Consultant)										
7		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
8		Elkhart Public Library - Pierre Moran Branch 2400 Benham Avenue Elkhart IN 46517 (Library)										
9												
10												
11												
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