



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: June 4, 2012

RE: Penz Products, Inc / 141-31363-00128

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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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Penz Products, Inc.
1320 South Merrifield Avenue
Mishawaka, Indiana 46544

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

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

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

Operation Permit No.: M141-31363-00128	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 4, 2012 Expiration Date: June 4, 2022

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary truck/container component manufacturing operation.

Source Address:	1320 South Merrifield Avenue, Mishawaka, Indiana 46544
General Source Phone Number:	574-255-4736
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
County Location:	St. Joseph (the area North of Kern Road and East of Pine Road)
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Metal surface coating process, identified as SC, constructed in 1985, exhausting at stacks V12 through V14, and consisting of the following units:
 - (1) One (1) dip tank with a maximum capacity of 2,707 metal parts per hour.
 - (2) One (1) natural gas-fired burn-off oven with a maximum heat input capacity of 0.39 MMBtu per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6.
- (c) Two (2) shot blasting machines, identified as ID 451 and 452, each with a maximum throughput rate of 200 pounds of shot blast per hour, with emissions controlled by dust collectors DC-1 and DC-2, respectively.
- (d) Five (5) surface grinders, with a maximum throughput rate of 500 pounds of 5/8 inches plywood per hour, with emissions controlled by dust collector DC-3.
- (e) One (1) woodworking operation consisting of one (1) belt sander, three (3) table saws, and one (1) wood lathe, with a maximum throughput rate of 500 pounds of 5/8" plywood per hour, with emissions controlled by dust collector DC-4.
- (f) Six (6) plastic injection molding machines, constructed in 2006, with a maximum process rate of 475 pounds of ABS plastic pellets combined, and 0.95 gallons of machine flush per hour.

(g) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, identified as the Welding and Cutting Process, used with the metal fabrication process, consisting of the following:

- (1) Twenty-four (24) welders.
- (2) Two (2) spot welders.
- (3) Five (5) cutting torches.
- (4) Two (2) plasma cutters.
- (5) One (1) stick welder.
- (6) Three (3) yoke welders.
- (7) Four (4) cutting torches.
- (8) One (1) blade welder.

(h) Metal and plastic fabrication processes, identified as MF, consisting of the following equipment:

No. of Units	Description
1	Belt Sander
2	Bench Grinders
5	Disk Sanders
14	Drill Presses
3	Horizontal Mills
1	Pedestal Grinder
1	Radial Arm Saw
6	Turet Lathes
4	Vertical Mills
1	Belt Grinder
2	Bench Grinders
1	Blade Sharpener
2	Disk Sanders
4	Drill Presses
1	Hone
4	Horizontal Bandsaws
5	Metal Lathes
2	Miter Saws
1	Pedestal Grinder
1	Radial Drill
1	Trigger Cold Cut Off Saw
2	Tube Cutters
1	Vertical Bandsaw
5	Vertical Mills
5	Belt Sanders
1	Bench Grinder
2	Buffers
1	Buzz Router Table
1	Compound Miter Saw
20	Drill Presses
1	Edge Sharpener
1	Horizontal Mills

No. of Units	Description
1	Jig Saw
2	Lathes
1	Mill Tracer
1	Planer
4	Plastic Grinders
2	Radial Arm Saws
1	Spindle Sander
7	Vertical Bandsaws
1	Vertical Mills

- (i) Natural gas-fired combustion units with heat input equal to or less than ten million (10,000,000) Btu per hour, the furnaces have no control and exhaust to the exterior of the building through a single stack, consisting of the following units:

Description	Number of Emission Units	Heat Input Capacity Per Unit (MMBtu/hr)	Heat Input Capacity Total (MMBtu/hr)
Bldg. 1524 Make-up	1	2.200	2.200
Bldg.1524, Forced Air Furnaces - Office	2	0.092	0.184
Forced Air Furnace - Press Room	3	0.160	0.480
Forced Air Furnace - Press Room	1	0.150	0.150
Saw Room	1	0.115	0.115
Coil Storage	1	0.200	0.200
Tool Room	1	0.100	0.100
Offices	2	0.100	0.200
Burn-Off Oven	1	0.390	0.390
Wash Tank	1	1.500	1.500
Drying Tunnel	1	1.500	1.500
Paint Tube	1	0.100	0.100
Ship Tube	1	0.100	0.100
Ship Furnace	2	0.125	0.250
Machine Shop	1	0.120	0.120
Machine Shop	1	0.175	0.175
Weld Furnace	1	0.200	0.200
Weld Make-up	1	1.000	1.000
Office	1	0.115	0.115
TOTALS	24	3.44	9.08

- (j) One (1) Vacuum forming process for plastics, identified as VF, with a maximum ABS plastic throughput rate of 400 pounds per hour.
- (k) Urethane foam and assembly process (identified as UFA), the process does not utilize a blowing agent but is a chemical reaction between two chemicals, exhausting at stacks V21 and V25-V30, and consisting of the following units:

- (1) Three (3) urethane foam machines, identified as UFM1 through UFM3, constructed in 1972, 1972, and 2001, using urethane polymer with negligible VOC.
- (2) One (1) hand application booth, with a maximum capacity of 350 metal parts per hour.
- (l) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, where the total capacity of equipment operated by the stationary source does not exceed 2,000,000 Btu per hour.
 - (1) Forklifts
- (m) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (n) Closed loop heating and cooling systems.
- (o) Infrared cure equipment.
- (p) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M141-31363-00128, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M141-31363-00128 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.12 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

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

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

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

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

- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

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

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Metal surface coating process, identified as SC, constructed in 1985, exhausting at stacks V12 through V14, and consisting of the following units:
- (1) One (1) dip tank, with a maximum capacity of 2,707 metal parts per hour.
 - (2) One (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 0.39 MMBtu per hour.

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

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

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water, for extreme performance coatings, as delivered to the dip tank used in conjunction with the one (1) metal surface coating process (identified as SC).

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.3 Incinerator [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the burn-off oven used in conjunction with the one (1) metal surface coating process, identified as SC, shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.

- (c) Comply with 326 IAC 5-1 and 326 IAC 2.
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications.
- (e) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than 200 pounds per hour.
- (f) If any of the requirements of paragraphs (a) through (e) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

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

A Preventive Maintenance Plan is required for the metal surface coating process. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

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

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) below. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS - Degreasing

Emissions Unit Description:

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, and not if subject to 326 IAC 20-6.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following 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 is 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) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, 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 - Grinding, Woodworking, Shot Blasting, Injection Molding, Welding and Cutting Process, and Metal and Plastic Fabrication

Emissions Unit Description:

- (c) Two (2) shot blasting machines, identified as ID 451 and 452, each with a maximum throughput rate of 200 pounds of shot blast per hour, with emissions controlled by dust collectors DC-1 and DC-2, respectively.
- (d) Five (5) surface grinders, with a maximum throughput rate of 500 pounds of 5/8 inches plywood per hour, with emissions controlled by dust collector DC-3.
- (e) One (1) woodworking operation consisting of one (1) belt sander, three (3) table saws, and one (1) wood lathe, with a maximum throughput rate of 500 pounds of 5/8" plywood per hour, with emissions controlled by dust collector DC-4.
- (f) Six (6) plastic injection molding machines, constructed in 2006, with a maximum process rate of 475 pounds of ABS plastic pellets combined, and 0.95 gallons of machine flush per hour.
- (g) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, identified as the Welding and Cutting Process, used with the metal fabrication process, consisting of the following:
 - (1) Twenty-four (24) welders.
 - (2) Two (2) spot welders.
 - (3) Five (5) cutting torches.
 - (4) Two (2) plasma cutters.
 - (5) One (1) stick welder.
 - (6) Three (3) yoke welders.
 - (7) Four (4) cutting torches.
 - (8) One (1) blade welder.
- (h) Metal and plastic fabrication processes, identified as MF, consisting of the following equipment:

No. of Units	Description
1	Belt Sander
2	Bench Grinders
5	Disk Sanders
14	Drill Presses
3	Horizontal Mills
1	Pedestal Grinder
1	Radial Arm Saw
6	Turet Lathes
4	Vertical Mills
1	Belt Grinder
2	Bench Grinders
1	Blade Sharpener
2	Disk Sanders
4	Drill Presses
1	Hone

4	Horizontal Bandsaws
5	Metal Lathes
2	Miter Saws
1	Pedestal Grinder
1	Radial Drill
1	Trigger Cold Cut Off Saw
2	Tube Cutters
1	Vertical Bandsaw
5	Vertical Mills
5	Belt Sanders
1	Bench Grinder
2	Buffers
1	Buzz Router Table
1	Compound Miter Saw
20	Drill Presses
1	Edge Sharpener
1	Horizontal Mills
1	Jig Saw
2	Lathes
1	Mill Tracer
1	Planer
4	Plastic Grinders
2	Radial Arm Saws
1	Spindle Sander
7	Vertical Bandsaws
1	Vertical Mills

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

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

D.3.1 Particulate [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from each of the emission units at this source shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)) as shown in the table below:

Emission Unit	Control Description	Particulate Emission Limit (gr/dscf)
Shot Blasting Machine ID 452	Dust Collector DC-1	0.03
Shot Blasting machine ID 452	Dust Collector DC-2	0.03
(5) surface grinders	Dust Collector DC-3	0.03
Woodworking Operation	Dust Collector DC-4	0.03
Each of the six (6) Injection Molding Machines	none	0.03
Welding and Cutting Process	none	0.03
Metal and Plastic Fabrication Process (MF)	none	0.03

Compliance Determination Requirements

D.3.2 Particulate Control

In order to comply with Condition D.3.1, the dust collectors (identified as DC-1 through DC-4) for particulate control shall be in operation at all times and control emissions from the shot blast machines, surface grinders, and woodworking process at all times that the shot blast machines, surface grinders, and woodworking process are in operation

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Penz Products, Inc.
Address:	1320 South Merrifield Avenue
City:	Mishawaka, Indiana 46544
Phone #:	574-255-4736
MSOP #:	M141-31363-00128

I hereby certify that Penz Products, Inc. is:

still in operation.

I hereby certify that Penz Products, Inc. is:

no longer in operation.

in compliance with the requirements of MSOP M141-31363-00128.

not in compliance with the requirements of MSOP M141-31363-00128.

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

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

Noncompliance:

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

**Technical Support Document (TSD) for a
Minor Source Operating Permit Renewal**

Source Background and Description
--

Source Name:	Penz Products, Inc.
Source Location:	1320 South Merrifield Avenue, Mishawaka, IN 46544
County:	St. Joseph (the area North of Kern Road and East of Pine Road)
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
Permit Renewal No.:	M141-31363-00128
Permit Reviewer:	Janet Mobley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Penz Products, Inc. relating to the operation of a truck/container component manufacturing operation. On January 13, 2012, Penz Products, Inc. submitted an application to the OAQ requesting to renew its operating permit. Penz Products, Inc. was issued a MSOP (M141-23663-00128) on May 10, 2007.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Metal surface coating process (identified as SC), constructed in 1985, exhausting at stacks V12 through V14, and consisting of the following units:
 - (1) One (1) dip tank, with a maximum capacity of 2,707 metal parts per hour.
 - (2) One (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 0.39 MMBtu per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6.
- (c) Two (2) shot blasting machines (identified as ID 451 and 452), each with a maximum throughput rate of 200 pounds of shot blast per hour, with emissions controlled by dust collectors DC-1 and DC-2, respectively.
- (d) Five (5) surface grinders with a maximum throughput rate of 500 pounds of 5/8 inches plywood per hour, with emissions controlled by dust collector DC-3.
- (e) One (1) woodworking operation consisting of one (1) belt sander, three (3) table saws, and one (1) wood lathe, with a maximum throughput rate of 500 pounds of 5/8" plywood per hour, with emissions controlled by dust collector DC-4.
- (f) Six (6) plastic injection molding machines, constructed in 2006, with a maximum process rate of 475 pounds of ABS plastic pellets combined, and 0.95 gallons of machine flush per hour.

(g) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, identified as the Welding and Cutting Process, used with the metal fabrication process, consisting of the following:

- (1) Twenty-four (24) welders.
- (2) Two (2) spot welders.
- (3) Five (5) cutting torches.
- (4) Two (2) plasma cutters.
- (5) One (1) stick welder.
- (6) Three (3) yoke welders.
- (7) Four (4) cutting torches.
- (8) One (1) blade welder.

(h) Metal and plastic fabrication processes, identified as MF, consisting of the following equipment:

No. of Units	Description
1	Belt Sander
2	Bench Grinders
5	Disk Sanders
14	Drill Presses
3	Horizontal Mills
1	Pedestal Grinder
1	Radial Arm Saw
6	Turet Lathes
4	Vertical Mills
1	Belt Grinder
2	Bench Grinders
1	Blade Sharpener
2	Disk Sanders
4	Drill Presses
1	Hone
4	Horizontal Bandsaws
5	Metal Lathes
2	Miter Saws
1	Pedestal Grinder
1	Radial Drill
1	Trigger Cold Cut Off Saw
2	Tube Cutters
1	Vertical Bandsaw
5	Vertical Mills
5	Belt Sanders
1	Bench Grinder
2	Buffers
1	Buzz Router Table
1	Compound Miter Saw
20	Drill Presses
1	Edge Sharpener
1	Horizontal Mills
1	Jig Saw

No. of Units	Description
2	Lathes
1	Mill Tracer
1	Planer
4	Plastic Grinders
2	Radial Arm Saws
1	Spindle Sander
7	Vertical Bandsaws
1	Vertical Mills

- (i) Natural gas-fired combustion units with heat input equal to or less than ten million (10,000,000) Btu per hour, the furnaces have no control and exhaust to the exterior of the building through a single stack, consisting of the following units:

Description	Number of Emission Units	Heat Input Capacity Per Unit (MMBtu/hr)	Heat Input Capacity Total (MMBtu/hr)
Bldg. 1524 Make-up	1	2.200	2.200
Bldg.1524, Forced Air Furnaces - Office	2	0.092	0.184
Forced Air Furnace - Press Room	3	0.160	0.480
Forced Air Furnace - Press Room	1	0.150	0.150
Saw Room	1	0.115	0.115
Coil Storage	1	0.200	0.200
Tool Room	1	0.100	0.100
Offices	2	0.100	0.200
Burn-Off Oven	1	0.390	0.390
Wash Tank	1	1.500	1.500
Drying Tunnel	1	1.500	1.500
Paint Tube	1	0.100	0.100
Ship Tube	1	0.100	0.100
Ship Furnace	2	0.125	0.250
Machine Shop	1	0.120	0.120
Machine Shop	1	0.175	0.175
Weld Furnace	1	0.200	0.200
Weld Make-up	1	1.000	1.000
Office	1	0.115	0.115
TOTALS	24	3.44	9.08

- (j) One (1) Vacuum forming process for plastics, identified as VF, with a maximum ABS plastic throughput rate of 400 pounds per hour.
- (k) Urethane foam and assembly process (identified as UFA), the process does not utilize a blowing agent but is a chemical reaction between two chemicals, exhausting at stacks V21 and V25-V30, and consisting of the following units:

- (1) Three (3) urethane foam machines, identified as UFM1 through UFM3, constructed in 1972, 1972, and 2001, using urethane polymer with negligible VOC.
 - (2) One (1) hand application booth, with a maximum capacity of 350 metal parts per hour.
- (l) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, where the total capacity of equipment operated by the stationary source does not exceed 2,000,000 Btu per hour.
- (1) Forklifts
- (m) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (n) Closed loop heating and cooling systems.
- (o) Infrared cure equipment.
- (p) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted emission units operating at this source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

The source has not removed emission units from this source during this review process.

Existing Approvals

Since the issuance of the MSOP (141-23663-00128) on May 10, 2007, the source has not constructed or been issued any approvals.

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

Air Pollution Control Justification as an Integral Part of the Process

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in St. Joseph 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.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including St. Joseph County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour 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 (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
St. Joseph 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**
St. Joseph County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance

Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, PM, PM10, PM2.5 and VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

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 MSOP 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)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
* Metal Surface Coating Process (SC)	0.00	0.00	0.00	0.00	0.00	61.84	0.00	0.00	4.58	4.58 Cobalt Compound
Degreaser	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00	
Shot blasting machine 1, ID 451	4.22	4.22	4.22	0.00	0.00	0.00	0.00	0.00	0.00	
Shot blasting machine 2, ID 452	4.22	4.22	4.22	0.00	0.00	0.00	0.00	0.00	0.00	
Five Surface Grinders	3.75	3.75	3.75	0.00	0.00	0.00	0.00	0.00	0.00	
Wood Working Process	0.05	0.05	0.05	0.00	0.00	0.00	0.00	0.00	0.00	
Plastic Injection Molding Machines	0.00002	0.00002	0.00002	0.00	0.00	0.19	0.00	0.00	0.07	0.07 Methylene Chloride
Machine Wash of Plastic Injection Molding Machines	0.00	0.00	0.00	0.00	0.00	0.34	0.00	0.00	0.00	
Welding and Cutting Units, (MF)	10.88	10.88	10.88	0.00	0.00	0.00	0.00	0.00	0.03	0.02 Manganese
Metal & Plastic Fabrication Processes	3.50	3.50	3.50	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Combustion Units	0.08	0.30	0.30	0.02	3.98	0.22	3.34	4,800.96	0.08	0.07 Hexane
Urethane foam and assembly process, identified as UFA, consisting of 3 Urethane Foam Machines, identified as UFM1, UFM 2 and UFM 3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Hand Application Booth	0.00	0.00	0.00	0.00	0.00	15.22	0.00	0.00	1.25	1.25 Toluene
Total PTE of Entire Source	26.70	26.93	26.93	0.02	3.98	80.30	3.34	4,800.96	6.01	
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . * Subject to the provisions of 326 IAC 8-2-9.										

MSOP Status

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and it is not in one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

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

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The provisions of New Source Performance Standard (NSPS) 40 CFR 60, Subpart E - Standards of Performance for Incinerators (326 IAC 12) are not included in the permit for this source because the charging rate of the burn-off oven used in conjunction with the one (1) metal coating process (identified as SC) is less than fifty (50) tons per day.
- (c) The provisions of New Source Performance Standard (NSPS) 40 CFR 60.310-60.316, Subpart EE - Standards of Performance for Surface Coating for Metal Furniture are not included in the permit for this source because this source does not perform metal furniture surface coating.
- (d) The provisions of New Source Performance Standards for Metal Coil Surface Coating (40 CFR Part 60.460-60.466, Subpart TT) are not included in this permit for the source because this source does not perform metal coil surface coating.
- (e) The provisions of New Source Performance Standards for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60.580 - 60.585, Subpart FFF) are not included in this permit for the source because this source does not have any rotogravure printing lines.
- (f) The provisions of New Source Performance Standards for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60.720 - 60.726, Subpart TTT) are not included in this permit for the source because this source does not engage in surface coating of any business machines.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (b) The solvents applied for the degreasing operation do not contain any halogenated HAP specified in 40 CFR 63.460. Therefore, the provisions of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) are not included in this permit for the source.

- (c) The provisions of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Coating of Parts and Products (40 CFR 63, Subpart MMMM) are not included in this permit for the source because HAP emissions from this source are less than major source threshold levels.
- (d) The provisions of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP) are not included in this permit for the source because HAP emissions from this source are less than major source threshold levels.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63, Subpart HHHHHH (63.11169 through 63.11180) (326 IAC 20), are not included in this permit, since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipments (it surface coats components for truck containers) and does not perform spray application of coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrates.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit because the source's SIC code (3714) is not included in the EPA source category list for the nine metal fabrication and finishing source categories. Although the source engages in shot blasting operations, it does not qualify as one of the nine source categories, rendering this rule not applicable.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-56 (40 CFR 63.5785, Subpart WWWW (Reinforced Plastic Composites Production)), are not included in this permit because this source limits the amount of hazardous air pollutants (HAPs) emitted, such that the potential to emit of any single HAP is limited to less than 10 tons per year and the potential to emit of any combination of HAPs is limited to less than 25 tons per year.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

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

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

This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit (before control) of all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO_{2e} per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

The HAP emissions from the operation of a stationary truck/container component manufacturing plant are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for combination of HAPs. Therefore, the provisions of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

This source is located in St. Joseph County, the area North of Kern Road and East of Pine Road. 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 the permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6.5 PM Limitations Except Lake County

This stationary source is located in St. Joseph County. This source is not specifically listed in 326 IAC 6.5-7 and the unlimited potential to emit is less than one hundred (100) tons of particulate matter per year. However, this source has actual particulate matter (PM) emissions greater than ten (10) tons per year based on the fact that the PM PTE is greater than 10 tons per year and there is no existing limitation in the permit that restrict the PM emissions to less than 10 tons/year.

Therefore, pursuant to 326 IAC 6.5-1-2(a), PM emissions from each of the units shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

326 IAC 6.8 PM Limitations for Lake County

This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6-4 (Fugitive Dust Emissions)

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.

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

The source is not subject to the requirements of 326 IAC 6-5 because the potential fugitive particulate matter emissions are negligible.

State Rule Applicability – Individual Facilities

State Rule Applicability - Metal Surface Coating Process (SC)

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

The provisions of 326 IAC 8-1-6 do not apply to the dip tank used in conjunction with the one (1) metal surface coating process (identified as SC) because it is subject to the provisions of 326 IAC 8-2-9.

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

The dip tank used in conjunction with the metal surface coating process is used for metal coating and the source operates under the Standard Industrial Classification Code of major group #37. Therefore, pursuant to 326 IAC 8-2-9:

The owner or operator shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds per gallon, excluding water, for extreme performance coatings, utilized/as delivered to the dip tank used in conjunction with the one (1) metal surface coating process (identified as SC).

Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Based on the MSDS submitted by the Permittee, the VOC content of the coating utilized/delivered to the dip tank is in compliance with this requirement.

To document the compliance status the Permittee shall maintain records of the VOC usage for the dip tank on a daily basis. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with each of the VOC usage limit for the dip tank:

- (1) The VOC content of each coating material and solvent used less water.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

This source is not subject to 326 IAC 8-2-2 because the one (1) metal surface coating process does not surface coat automobile and light duty truck bodies. It surface coats components for truck containers.

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

The provisions of 326 IAC 6-3-2 do not apply to the one (1) metal surface coating process (identified as SC) because there are no particulate emissions from the dip tank.

State Rule Applicability - Burn-off Oven

In previous permit, F141-15168-00128, issued May 22, 2002, it was determined that the burn-off oven used in conjunction with the one (1) metal surface coating process (identified as SC) was subject to the provisions of 326 IAC 4-2, because it meets the definition of an incinerator according to 326 IAC 4-2-1, and the oven is still subject to this rule in the renewal.

326 IAC 4-2 (Incinerator Requirements)

Pursuant to 326 IAC 4-2, the burn-off oven used in conjunction with the one (1) metal surface coating process (identified as SC) shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications.
- (e) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than 200 pounds per hour.
- (f) If any of the requirements of subdivisions (a) through (e) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

State Rule Applicability – Degreaser

326 IAC 8-3-2 (Cold Cleaner Operation)

The degreaser unit at this source existed as of January 1, 1980, and the source is located in St. Joseph County. However, the potential VOC emissions from the entire source are less than 100 tons per year. Therefore, according to 326 IAC 8-3-1, the provisions of 326 IAC 8-3-2 do not apply.

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

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in St. Joseph County, the Permittee shall ensure that the following 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 is 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) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, 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.

State Rule Applicability – Shot Blast Machines, Surface Grinders and Woodworking

Note: The following applicable requirements from the previous permit been removed in this MSOP Renewal since the source is subject to 326 IAC 6.5 and not 326 IAC 6-3-2.

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the shot blast machines, surface grinders, and wood-working process shall not exceed the particulate emission limits in pounds per hour as shown in the table below:

Emission Units	Process Weight		Particulate Emission Limit (lbs/hour)
	(lbs/hour)	(tons/hour)	
Each of the two (2) shot blast machines	200	0.10	0.88
Five surface grinders	500	0.25	1.62
Wood-working	500	0.25	1.62

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the six (6) plastic injection molding machines shall not exceed the particulate emission limits in pounds per hour as shown in the table below:

Emission Units	Process Weight		Particulate Emission Limit (lbs/hour)
	(lbs/hour)	(tons/hour)	
Each Injection Molding Machine	79.2	0.039	0.47

- (c) The pounds per hour limitations are calculated with the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour.}$$

- (d) 326 IAC 6-3-2 (Particulate Matter Emission Limitations for Manufacturing Processes) The particulate from the metal fabrication processes (MF) shall not exceed the 14.8 pounds per hour when operating at a process weight rate of 6.77 tons per hour.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a) and 326 IAC 6.5-1-2(a), this source is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), because this source is located in St. Joseph County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year.

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Emission Unit	Control Description	Particulate Emission Limit (gr/dscf)
Each of the two (2) shot blast machines	Dust Collectors DC-1 and DC-2	0.03
Five surface grinders	Dust Collector DC-3	0.03
Woodworking Operation	Dust Collector DC-4	0.03

In order to comply with these limits, the dust collectors (identified as DC-1 through DC-4) for particulate control shall be in operation at all times and control emissions from the shot blast machines, surface grinders, and woodworking process at all times that the shot blast machines, surface grinders, and woodworking process are in operation.

This is a change in requirements.

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

Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established by 326 IAC 6.5-1-2 for each facility are more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the source is not subject to the requirements of 326 IAC 6-3-2.

State Rule Applicability – Six Plastic Injection Molding Machines

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a) and 326 IAC 6.5-1-2(a), this source is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), because this source is located in St. Joseph County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year.

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Emission Unit	Control Description	Particulate Emission Limit (gr/dscf)
Each Injection Molding Machine	None	0.03

This is a change in requirements.

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

Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established by 326 IAC 6.5-1-2 for each facility are more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the source is not subject to the requirements of 326 IAC 6-3-2.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from the machine flush used in the six plastic injection molding machines are less than twenty-five (25) tons per year. Therefore, the provisions of 326 IAC 8-1-6 do not apply.

State Rule Applicability – Welding and Cutting Processes

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

- (a) The welding processes at the source consume less than 625 pounds of rod or wire per day. Therefore, the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) do not apply.
- (b) The provisions of 326 IAC 6-3-2 do not apply to the torch cutting operations at this source because torch cutting operations which cut less than 3,400 inches per hour of one (1) inch thickness stock are exempt from the provisions of 326 IAC 6-3-2.

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Emission Unit	Control Description	Particulate Emission Limit (gr/dscf)
Welding and Cutting Processes	None	0.03

This is a new requirement for the source.

State Rule Applicability – Metal and Plastic Fabrication Processes

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a) and 326 IAC 6.5-1-2(a), this source is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), because this source is located in St. Joseph County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than 10 tons per year.

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the facilities listed below shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Emission Unit	Control Description	Particulate Emission Limit (gr/dscf)
Metal Fabrication Processes (MF)	None	0.03

This is a new requirement for the source.

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

Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established by 326 IAC 6.5-1-2 for each facility are more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the source is not subject to the requirements of 326 IAC 6-3-2.

State Rule Applicability - One (1) Vacuum forming process for plastics

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from the one (1) vacuum forming process for plastics process is less than twenty-five (25) tons per year. Therefore, the provisions of 326 IAC 8-1-6 do not apply. This determination was made in F141-15168-00128, issued to the source on May 22, 2002.

State Rule Applicability - Urethane Foaming and Assembly Process (UFA) and Hand Application Booth

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from the hand application booth used in conjunction with one (1) urethane foaming and assembly process is less than twenty-five (25) tons per year. Therefore, the provisions of 326 IAC 8-1-6 do not apply.

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

The provisions of 326 IAC 8-2-9 do not apply to the one (1) urethane foaming and assembly process because this process only applies adhesives to plastic parts.

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

The provisions of 326 IAC 6-3-2 do not apply to the one (1) urethane foaming and assembly process (identified as UFA) because there are no particulate emissions from this process.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(b), the one (1) urethane foaming and assembly process (identified as UFA) is not subject to the provisions of of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), because there are no particulate emissions from this process.

State Rule Applicability - Natural-Gas Fired Combustion Units

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

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because they are subject to 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

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

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because they are subject to 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(b), the natural gas-fired heating combustion units at the source are not subject to the provisions of of 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), since they each burn only natural gas.

Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO₂ equivalent emissions (CO₂e). Therefore, CO₂e emissions have been calculated for the natural gas fired combustion units at this source.

Compliance Determination, Monitoring and Testing Requirements

- (a) There are no compliance determination and monitoring requirements applicable to this source.
- (b) There are no testing requirements applicable to this source.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 13, 2012. Additional information was received on March 30, 2012.

Conclusion

The operation of this truck/container component manufacturing operation shall be subject to the conditions of the attached MSOP Renewal No. 141-31363-00128.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Janet Mobley at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Summary**

Company Name: Penz Products, Inc.
Address City IN Zip: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
Permit Number: M141-31363-00128
Reviewer: Janet Mobley

Uncontrolled Potential to Emit (tons/year)

									Total	Single	Worst Single
Process/Emission Unit	PM	PM-10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	HAPs	HAPS	HAPS
* Metal Surface Coating Process, identified as SC	0.00	0.00	0.00	0.00	0.00	61.84	0.00	0.00	4.58	4.58	Cobalt Compound
Degreaser	0.00	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.00	0.00	
Shot Blast Machine 1, ID 451	4.22	4.22	4.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Shot Blast Machine 2, ID 452	4.22	4.22	4.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Five Surface Grinders	3.75	3.75	3.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Wood Working Process	0.05	0.05	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Plastic Injection Molding Machines	0.00002	0.00002	0.00002	0.00	0.00	0.19	0.00	0.00	0.07	0.07	Chloride
Machine Wash of Plastic Injection Molding Machines	0.00	0.00	0.00	0.00	0.00	0.34	0.00	0.00	0.00	0.00	
Welding and Cutting Units	10.88	10.88	10.88	0.00	0.00	0.00	0.00	0.00	0.03	0.02	Manganese
Metal & Plastic Fabrication Processes, identified as MF	3.50	3.50	3.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Combustion units	0.08	0.30	0.30	0.02	3.98	0.22	3.34	4,800.96	0.08	0.07	Hexane
Urethane foam and assembly process, identified as UFA, consisting of 3 Urethane Foam Machines, identified as UFM1, UFM 2 and UFM 3.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Hand Application Booth	0.00	0.00	0.00	0.00	0.00	15.22	0.00	0.00	1.25	1.25	Toluene
Total Emissions	26.70	26.93	26.93	0.02	3.98	80.30	3.34	4,800.96	6.01	6.00	

* Subject to the provisions of 326 IAC 8-2-9.

PM10=PM=PM2.5

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

**Appendix A: Emission Calculations
VOC and HAPs
From the Metal Surface Coating Process (SC)**

Company Name: Penz Products, Inc.
Address: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
MSOP: M141-31363-00128
Reviewer: Janet Mobley

1. Emissions from Dip Tank

Material	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Max. Throughput (units/hour)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	Weight % Glycol Ethers	PTE of Glycol Ethers (tons/year)	Weight % Cobalt Compound	Cobalt Compound Emissions (tons/year)
Primer	11.7	43%	29%	13.5%	41.4%	37.3%	0.0033	2,702	1.58	14.1	61.8	0.00%	0.0	1.00%	4.58

Total VOC (tons/year) = **61.84**
Total HAPs (tons/year) = **4.58**

* The primer used consists of Ethylene Glycol Monobutyl Ether (EGBE, 2- Butoxyethanol, CAS 111-76-2) which has been de-listed from the list of HAPs established by 42 U.S.C. 7412 (b)(1) [69 FR 69325, November 29, 2004]

METHODOLOGY

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

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour)

PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of HAPs (tons/year) = Density (lbs/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC Emissions From Degreaser**

Company Name: Penz Products, Inc.
Address: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
MSOP: M141-31363-00128
Reviewer: Janet Mobley

Material	Density (lbs/gal)	Usage Rate (gal/hour)	Weight % VOC	PTE of VOC (lbs/hr)	PTE of VOC (tons/year)
Mineral Spirits	7.6	0.0750	100%	0.57	2.49

* Contains no HAPs

METHODOLOGY

PTE of VOC (tons/year) = Density (lbs/gal) * Usage Rate (gal/hour) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Particulate Emissions**

Company Name: Penz Products, Inc.
Address: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
MSOP: M141-31363-00128
Reviewer: Janet Mobley

Process/Emission Units	Control ID	No. of Units	Airflow (acfm)	Outlet Grain Loading per Actual Cubic Foot	Control Efficiency (%)	PTE of PM and PM10 After Control (tons/year)	PTE of PM and PM10 Before Control (tons/year)
Shot Blast Machine 1	DC1	1	750	0.0015	99%	0.04	4.22
Shot Blast Machine 2	DC2	1	750	0.0015	99%	0.04	4.22
Five Surface Grinders	DC3	1	500	0.002	99%	0.04	3.75
Total PTE of PM/PM10 (tons/year) =						0.12	12.20

Assume all PM emissions are equal to PM10.

METHODOLOGY**After Control:**

PTE of PM/PM10 (tons/year) = Grain Loading (grains/acf) * Air Flow Rate (acfm) * 1 lb/7000 grains * 60 min/hour * 8760 hours/year * 1 ton/2000 lbs

Before Control:

PTE of PM/PM10 (tons/year) = Grain Loading (grains/acf) * Air Flow Rate (acfm) * 1 lb/7000 grains * 60 min/hour * 8760 hours/year * 1 ton/2000 lbs * 1/(1-Control Efficiency %)

Process/Emission Units	Control ID	No. of Units	Airflow (acfm)	Outlet Grain Loading per Actual Cubic Foot	Control Efficiency (%)	PTE of PM and PM10 After Control (tons/year)	PTE of PM and PM10 Before Control (tons/year)
One Wood-Working Process*	DC4	1	1,250	0.001	99%	0.05	0.05
Total PTE of PM/PM10 (tons/year) =						0.05	0.05

METHODOLOGY**After Control:**

PTE of PM/PM10 (tons/year) = Grain Loading (grains/acf) * Air Flow Rate (acfm) * 1 lb/7000 grains * 60 min/hour * 8760 hours/year * 1 ton/2000 lbs

Before Control:

PTE of PM/PM10 (tons/year) = Grain Loading (grains/acf) * Air Flow Rate (acfm) * 1 lb/7000 grains * 60 min/hour * 8760 hours/year * 1 ton/2000 lbs * 1/(1-Control Efficiency %)

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

**Appendix A: Emission Calculations
VOC, HAP and PM/PM10 Emissions
From Six Injection Molding Machines**

Company Name: Penz Products, Inc.
Address: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
MSOP: M141-31363-00128
Reviewer: Janet Mobley

Material	Max. Usage Rate (lbs/hour)	* Emission Factor VOC	PTE of VOC (lbs/hour)	PTE of VOC (ton/year)	* Emission Factor for Total HAP	PTE of HAP (lb/hour)	* PTE of HAP (ton/year)	* Emission Factor for PM/PM10	PTE of PM/PM10 (lb/hour)	PTE of PM/PM10 (ton/year)
		(lb pollutant/lb rubber)			(lb pollutant/lb rubber)			(lb pollutant/lb rubber)		
ABS Plastic Pellets	475	9.04E-05	4.29E-02	0.19	3.52E-05	1.67E-02	0.07	7.77E-09	3.7E-06	1.62E-05

* There is no emission factor available for plastic injection molding machines in AP-42, therefore the emission factor used above is for the worst case compound #6.

Based on the Rubber Manufacturers Association (RMA), Table 4.12-6 - Extruder (1994).

AP 42, Volume I, Fifth Edition, Chapter 4: Evaporation Loss Sources, Draft Sections Under Review, Section 4.12 Manufacturer of Rubber Products, Emission Factors Tables, Extrude-SCC 3-08-001-12.

* The single highest HAP is Methylene Chloride from processing of Compound #6.

METHODOLOGY

Potential To Emit (lb/hour) = Max. Usage Rate (lbs/hour) * Emission Factor (lb pollutant / lb rubber)

Potential To Emit (ton/year) = Max. Usage Rate (lbs/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC Emissions
From the Machine Flush of Six Injection Molding Machines**

**Company Name: Penz Products, Inc.
Address: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
MSOP: M141-31363-00128
Reviewer: Janet Mobley**

Material	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Max. Throughput (unit/hour)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)
PPC3TF1.3	8.39	1.00%	0.00%	1.00%	0.00%	99.3%	0.0010	475	0.08	0.04	0.17
DNA	7.92	1.00%	0.00%	1.00%	0.00%	99.1%	0.0010	475	0.08	0.04	0.16
Total VOC (tons/year) =											0.34

* The material used does not contain any HAPs.

METHODOLOGY

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

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour)

PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
PM and HAP Emissions
From Welding and Cutting Process**

Company Name: Penz Products, Inc.
Address: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
MSOP: M141-31363-00128
Reviewer: Janet Mobley

Process	Number of Stations	Maximum lbs. of Electrode Consumption per hour per station	Type of wire used	Emission Factors (lb pollutant/lb electrode)				Potential To Emit (lbs/hour)			
				PM/PM10	Mn	Ni	Cr	PM/PM10	Mn	Ni	Cr
Welding:											
Metal Inert Gas (MIG)(carbon steel)	20	3.50	ER70S-6	0.0241	0.000034	0	0.00001	1.69	0.002	0.0	7.0E-04
Metal Inert Gas (MIG)(carbon steel)	5	0.05	ER308	0.0241	0.000034	0	0.00001	0.006	0.0	0.0	2.5E-06
Stick (E7018 electrode)	5	0.05	ER70S-2	0.0211	0.0009	0	0	0.005	0.0	0.0	0.0
Stick (E7018 electrode)	5	0.06	ER5356	0.0211	0.0009	0	0	0.006	0.0	0.0	0.0
Cutting:											
Process	Number of Stations	Max. Metal Thickness Cut (inches)	Max. Metal Cutting Rate (inches/minute)	Emission Factors (lb pollutant/1,000 inches cut, 1" thick)				Potential To Emit (lbs/hour)			
				PM/PM10	Mn	Ni	Cr	PM/PM10	Mn	Ni	Cr
Flame Cutting: Oxypropylene	1	2	40	0.1622	0.0005	0.0001	0.0003	0.779	0.002	4.8E-04	0.001

PTE (lbs/hour) =	2.48	0.01	4.80E-04	2.14E-03
PTE (tons/year) =	10.88	0.02	2.10E-03	0.01
Total HAPs	0.03			

*Emission Factors are from AP-42, Chapter 12.19, Table 12.19-2 (SCC # 3-09-52).

METHODOLOGY

Welding emissions (lbs/hour) = No. of Stations * Max. lbs of Electrode Consumption/hour/station * Emission Factor (lb pollutant/lb of electrode)

Flame Cutting emissions (lbs/hour) = No. of Stations * Max. Metal Thickness (inches) * Max. Cutting Rate (inches/minute) * 60 minutes/hour * Emission Factor (lb pollutant/1000 inches cut (1" thick))

PTE (tons/yr) = [Welding Emissions (lbs/hour) + Cutting Emissions (lbs/hour)] * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
Miscellaneous Metal & Plastic Fabrication Equipment (MF)

Company Name: Penz Products, Inc.
Address: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
MSOP: M141-31363-00128
Reviewer: Janet Mobley

Material	Description	Number of Units	Material Thickness (inches)	Cutting Surface Blade Thickness (inches)	Process Rate (inches/hour)	Material Loss Per Unit (in ³ /hour)	Material Density (lb/in ³)	Material Loss (lbs/hour)
Metal	Vertical Bandsaw	1	0.1793	0.0625	12.00	0.13	0.29	0.04
Plastic	Vertical Bandsaw	7	0.09375	0.0625	1.75	0.01	0.04	0.00
Metal	Radial Arm Saw	1	0.1793	0.125	12.00	0.27	0.29	0.08
Plastic	Radial Arm Saw	2	0.09375	0.125	6.00	0.07	0.04	0.01
Metal	Miter Saw	2	0.1793	0.125	6.00	0.13	0.29	0.08
Plastic	Miter Saw	1	0.09375	0.125	12.00	0.14	0.04	0.006
Plastic	Jig Saw	1	0.09375	0.0625	12.00	0.07	0.04	0.003
Metal	Cold Cutoff Saw	1	0.1793	0.125	12.00	0.27	0.29	0.08
Metal	Tube Cutters	2	0.1793	0.0625	6.00	0.07	0.29	0.04
Metal	Horizontal Bandsaw	4	0.1793	0.0625	3.00	0.03	0.29	0.04
Metal	Horizontal Mill	3	0.1793	0.0625	4.00	0.04	0.29	0.04
Plastic	Horizontal Mill	1	0.09375	0.0625	12.00	0.07	0.04	0.00
Metal	Vertical Mill	9	0.1793	0.0625	1.33	0.01	0.29	0.04
Plastic	Vertical Mill	1	0.09375	0.0625	12.00	0.07	0.04	0.003

PTE of PM/PM10 (tons/year) = **1.98**

METHODOLOGY

Material Loss per Unit (in³/hour) = Material Thickness (inches) * Cutting Surface Thickness (e.g., Blade (inches)) * Process Rate (inches/hour)

Material Loss (lb/hour) = Number of Units (n) * Material Loss (in³/hour) * Material Density (lb/in³)

PTE of PM/PM10 (tons/year) = Material Loss (lb/hour) * 8760 hours/year * 1 ton/2000 lbs

Material	Description	Number of Units	Material Thickness (inches)	Drilling Area (in ²)	Drill Rate (holes/hour)	Material Loss Per Unit (in ³ /hour)	Material Density (lb/in ³)	Material Loss (lbs/hour)
Metal	Radial Drill	1	0.1793	0.20	5.00	0.18	0.29	0.05
Metal	Drill Press	18	0.1793	0.05	5.00	0.04	0.29	0.23
Plastic	Drill Press	20	0.09375	0.05	5.00	0.02	0.04	0.02

PTE of PM/PM10 (tons/year) = **1.33**

METHODOLOGY

Material Loss per Unit (in³/hour) = Material Thickness (inches) * Drilling Area (in²) * Process Rate (holes/hour)

Material Loss (lb/hour) = Material Loss (in³/hour) * Material Density (lb/in³)

PTE of PM/PM10 (tons/year) = Material Loss (lb/hour) * 8760 hours/year * 1 ton/2000 lbs

Material	Description	Number of Units	Surface Thickness Removed (inches)	Surface Width Removed (inches)	Surface Distance (inches/hour)	Material Loss Per Unit (in ³ /hour)	Material Density (lb/in ³)	Material Loss (lbs/hour)
Metal	Lathes/Hones/Routers	12	0.03125	0.25	1.00	0.01	0.29	0.03
Plastic	Lathes/Hones/Routers	4	0.01000	0.25	3.00	0.01	0.04	1.20E-03
Plastic	Buffers	2	0.00100	0.25	50.00	0.0125	0.04	0.001
Metal	Sanders/Grinders/Sharpeners/Planers	16	0.03125	0.125	0.75	2.93E-03	0.29	0.01
Plastic	Sanders/Grinders/Sharpeners/Planers	13	0.01000	0.125	1.00	1.25E-03	0.04	0.001

PTE of PM/PM10 (tons/year) = **0.19**

TOTAL	3.50
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METHODOLOGY

Material Loss per Unit (in³/hour) = Surface Thickness (inches) * Surface Width (inches) * Surface Distance (inches/hour)

Material Loss (lbs/hour) = Material Loss (in³/hour) * Material Density (lb/in³)

PTE of PM/PM10 (tons/year) = Material Loss (lbs/hour) * 8760 hours/year * 1 ton/2000 lbs

NOTES:

Assume all loss of mass as particulate matter emissions "worst case scenario".

Steel Material Density (lb/in³) = Data from O'Neal Steel, Inc. Stock List and Reference Book, 1999 (0.29 lb/in³)

Plastic Material Density (lb/in³) = Technical Product Data Sheet for ABS (0.04 lb/in³)

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

Company Name: Penz Products, Inc.
Address City IN Zip: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
Permit Number: M141-31363-00128
Reviewer: Janet Mobley

Description	Number of Emission Units	Heat Input Capacity Per Unit (MMBtu/hr)	Heat Input Capacity Total (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
Bldg. 1524 Make-up	1	2.200	2.200	19.3
Bldg.1524, Forced Air Furnaces - Office	2	0.092	0.184	1.6
Bldg. 1402				
Forced Air Furnace - Press Room	3	0.160	0.480	4.2
Forced Air Furnace - Press Room	1	0.150	0.150	1.3
Saw Room	1	0.115	0.115	1.0
Coil Storage	1	0.200	0.200	1.8
Tool Room	1	0.100	0.100	0.9
Offices	2	0.100	0.200	1.8
Bldg. 1320				
Burn-Off Oven	1	0.390	0.390	3.4
Wash Tank	1	1.500	1.500	13.1
Drying Tunnel	1	1.500	1.500	13.1
Paint Tube	1	0.100	0.100	0.9
Ship Tube	1	0.100	0.100	0.9
Ship Furnace	2	0.125	0.250	2.2
Machine Shop	1	0.120	0.120	1.1
Machine Shop	1	0.175	0.175	1.5
Weld Furnace	1	0.200	0.200	1.8
Weld Make-up	1	1.000	1.000	8.8
Office	1	0.115	0.115	1.0
TOTALS				
	24	3.44	9.08	79.5

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
9.08	1000	79.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	1.9	7.6	7.6	0.6	3.98	5.5	84
	0.08	0.30	0.30	0.02		0.22	3.34

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

Methodology

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Penz Products, Inc.
Address City IN Zip: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
Permit Number: M141-31363-00128
Reviewer: Janet Mobley

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	8.351E-05	4.772E-05	2.982E-03	7.158E-02	1.352E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.988E-05	4.374E-05	5.567E-05	1.511E-05	8.351E-05
Total					7.505E-02

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See next page for Greenhouse Gas calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Greenhouse Gas Emissions

Company Name: Penz Products, Inc.
Address City IN Zip: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
Permit Number: M141-31363-00128
Reviewer: Janet Mobley

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
120,000	2.3	2.2	
Potential Emission in tons/yr	4,772	0.1	0.1
Summed Potential Emissions in tons/yr	4,772		
CO2e Total in tons/yr	4,800.96		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

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

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

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

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

**Appendix A: Emission Calculations
VOC and HAPs
From the Urethane Foaming and Assembly Process (UFA)**

**Company Name: Penz Products, Inc.
Address: 1320 S. Merrifield Avenue, Mishawaka, Indiana 46544
MSOP: M141-31363-00128
Reviewer: Janet Mobley**

1. Emissions from Urethane Foam Machines:

Pursuant to F141-15168-00128, issued May 22, 2002, it was determined that the urethane polymer contains almost 0% VOC. Therefore, the VOC and HAP emissions from these urethane foam machines are negligible.

The urethane foam operations do not utilize any blowing agent but is only a chemical reaction between two separate chemicals per source on March 30, 2012.

2. Emissions from the Hand Application Booth:

Material	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Gal of Mat. (gal/unit)	Max. Throughput (units/hour)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	Weight % Toluene	PTE of Toluene (tons/year)
Foam	9.22	0.00%	0.00%	0.00%	0.00590	350	0.0	0.0	0.0	0.0%	0.0
MEK	6.73	100%	0.00%	100%	0.00053	350	6.73	1.25	5.47	0.0%	0.0
Adhesive 6130	6.92	60.0%	20.00%	40.0%	0.00014	350	2.77	0.14	0.59	20.0%	0.30
Adhesive 4045	7.26	74.0%	15.00%	59.0%	0.00014	350	4.28	0.21	0.92	0.0%	0.0
Adhesive 6325	8.92	50.0%	0.00%	50.0%	0.00014	350	4.46	0.22	0.96	50.0%	0.96
S1018	8.96	100%	0.00%	100%	0.00053	350	8.96	1.66	7.28	0.0%	0.0
Total									15.2		1.25

Note: Since the transfer efficiencies for these material are 100%, there are no particulate emissions from this process.

Total VOC (tons/year) = 15.2
Total HAPs (tons/year) = 1.25

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics
 PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour)
 PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs
 PTE of HAPs (tons/year) = Density (lbs/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Matt Ludwig
Penz Products, Inc
1320 S. Merrifield Ave
Mishawaka, In 46544

DATE: June 4, 2012

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

SUBJECT: Final Decision
MSOP - Renewal
141-31363-00128

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:
Devis Penzenik (President)
Dennis Carter (TecServ Environmental, Inc)
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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June 4, 2012

TO: Mishawaka-Penn-Harris

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

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

Applicant Name: Penz Products, Inc
Permit Number: 141-31363-00128

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 6/4/2012 Penz Products, Inc. 141-31363-00128 (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		

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1		Matt Ludwig Penz Products, Inc. 1320 S Merrifield Ave Mishawaka IN 46544 (Source CAATS) via confirm delivery										
2		Devis A Penzenik President Penz Products, Inc. 1320 S Merrifield Ave Mishawaka IN 46544 (RO CAATS)										
3		Mishawaka City Council and Mayors Office 600 E. 3rd Street Mishawaka City Hall Mishawaka IN 46546 (Local Official)										
4		Mishawaka Penn Public Library 209 Lincoln Way E Mishawaka IN 46544-2084 (Library)										
5		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
6		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)										
7		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 (Health Department)										
8		Dennis Carter TecServ Environmental, Inc. 516 E. Marion St. Mishawaka IN 46545 (Consultant)										
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