



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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: January 24, 2013

RE: AsemPac/043-32502-00064

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



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Rick Cochran
1909 McDonald Ave
New Albany, IN 47150

January 24, 2013

Re: Exempt Construction and Operation Status,
043-32502-00064

Dear Mr. Cochran:

The application from AsemPac, received on November 8, 2012, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary plaque and trophy manufacturing plant located at 5300 Foundation Blvd, New Albany, Indiana, 47150 is classified as exempt from air pollution permit requirements:

- (a) One (1) paint booth, identified as Paint Booth #1 (EU-01), for the spray application of paints, enamels, and clear coats, installed in early 1990, with a maximum capacity of 6.25 trophy and plaque units per hour, using less than 5 gallons of coating per day, using fiberglass paint filters as control, and exhausting to stack S-13;
- (b) One (1) paint booth, identified as Paint Booth #2 (EU-02), for the spray application of mold release, installed in early 1990, with a maximum capacity of 10 trophy and plaque units per hour, using less than 5 gallons of mold release per day, using fiberglass paint filters as control, and exhausting to stack S-13;
- (c) One (1) paint booth, identified as Paint Booth #3 (EU-03), for the spray application of glues, installed in 2000, with a maximum capacity of 20 trophy and plaque units per hour, using less than 5 gallons of glue per day, using fiberglass paint filters as control, and exhausting to stack S-02;
- (d) One (1) paint booth, identified as Paint Booth #4 (EU-04), for the spray application of sealers, installed in 2000, with two (2) separate spray guns, with a maximum capacity of 6.25 trophy and plaque units per hour, using less than 5 gallons of sealer per day, using fiberglass paint filters as control, and exhausting to stack S-14;

Note: The four (4) paint booths (EU-01, EU-02, EU-03, and EU-04) are considered separate facilities because they coat different products and do not operate in a sequence.

- (e) One (1) woodworking operation, identified as EU-05, consisting of one (1) CNC router, with a maximum throughput of 2,068 pounds of wood per hour, and two (2) Timesaver sanders, each with a maximum throughput of 3,255 pounds of wood per hour, using an integral baghouse (Murphy-Rodgers MRSE 4-drum dust collector) for particulate control, and exhausting to the atmosphere;
- (f) One (1) silk screen operation, installed in 1990, identified as EU-06, consisting of three (3) manual workstations for the hand application of silk-screened inks and clear coat, with a maximum throughput of 31 trophy and plaque units per hour, and exhausting indoors;
- (g) Six (6) space heaters, identified as H001 - H006, each with a maximum heat input rating of 0.09 million Btu per hour;

- (h) Three (3) space heaters, identified as H007 - H009, each with a maximum heat input rating of 0.10 million Btu per hour;
- (i) Two (2) CO₂ laser engravers for piecework engraving of wood, plastic, and acrylic parts; and
- (j) One (1) Instapak foam system for packing delicate trophies and plaques for shipping.
- (k) Paved roads and parking lots with public access.

The following conditions shall be applicable:

- (a) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (b) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (c) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the baghouse shall be in operation at all times the woodworking operation is in operation in order to ensure the woodworking operation is exempted from 326 IAC 6-3-2.
 - (1) The integral baghouse for the woodworking operation shall be inspected semiannually and will be replaced if defective.
 - (2) In the event that a baghouse failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emission unit shall be shut down no later than the completion of the processing of the material in the emission line
 - (3) To document the compliance status, the Permittee shall maintain records of the results of these inspections
- (d) 326 IAC 8-2-9 (Miscellaneous metal coating operations)
To render the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable, the owner or operator of this source shall comply with the following:
 - (1) The VOC usage, including coatings, dilution solvents, and cleaning solvents, for Paint Booth #1 (EU-01) shall be limited to less than 15.0 pounds per day.

Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.
 - (2) To document compliance with this limit, the owner or operator of this source shall maintain records for the total VOC usage for Paint Booth #1 (EU-01) each day. These

records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for Paint Booth #1 (EU-01):

- (A) The amount and VOC content of each coating material, dilution solvent, and cleanup solvent used for each day. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.
- (B) The total VOC usage for each day.
- (3) Records of all required monitoring data, reports and support information required by this exemption 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 owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.
- (4) Unless otherwise specified in this exemption, all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval date of this exemption.

This exemption is the first air approval issued to this source.

A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Ryan Graunke, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-5374 or at 1-800-451-6027 (ext 4-5374).

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/REG

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

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

Technical Support Document (TSD) for an Exemption

Source Description and Location

Source Name:	AsemPac
Source Location:	5300 Foundation Blvd, New Albany, Indiana 47150
County:	Floyd
SIC Code:	3499 (Fabricated Metal Products, Not Elsewhere Classified)
Exemption No.:	043-32502-00064
Permit Reviewer:	Ryan Graunke

On November 8, 2012, the Office of Air Quality (OAQ) received an application from AsemPac related to the operation of a stationary plaque and trophy manufacturing plant.

Source Definition

This company consists of the following plants:

- (a) Fox Group dba Bruce Fox, Inc. is located at 1909 McDonald Lane, New Albany, Indiana 47150, Plant ID: 043-00035; and
- (b) AsemPac is located at 5300 Foundation Blvd, New Albany, Indiana 47150, Plant ID: 043-00064.

In order to consider both plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code; and
- (3) The plants must be located on contiguous or adjacent properties.

These plants have common ownership/control and have the same SIC code; however, IDEM does not consider the two plants to be adjacent because the properties are 2.8 miles apart and only a small percentage (<2%) of the production process is split between the two plants. Therefore, based on this evaluation these plants will not be considered one (1) source, as defined by 326 IAC 2-7-1(22).

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Floyd County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Floyd County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X. The 1-hour standard was revoked effective June 15, 2005. Basic nonattainment designation effective federally 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. Floyd 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}**
 U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Floyd County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Floyd County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by AsemPac on November 8, 2012, relating to the operation of an existing stationary plaque and trophy manufacturing plant.

The source consists of the following existing emission units:

- (a) One (1) paint booth, identified as Paint Booth #1 (EU-01), for the spray application of paints, enamels, and clear coats, installed in early 1990, with a maximum capacity of 6.25 trophy and plaque units per hour, using less than 5 gallons of coating per day, using fiberglass paint filters as control, and exhausting to stack S-13;
- (b) One (1) paint booth, identified as Paint Booth #2 (EU-02), for the spray application of mold

release, installed in early 1990, with a maximum capacity of 10 trophy and plaque units per hour, using less than 5 gallons of mold release per day, using fiberglass paint filters as control, and exhausting to stack S-13;

- (c) One (1) paint booth, identified as Paint Booth #3 (EU-03), for the spray application of glues, installed in 2000, with a maximum capacity of 20 trophy and plaque units per hour, using less than 5 gallons of glue per day, using fiberglass paint filters as control, and exhausting to stack S-02;
- (d) One (1) paint booth, identified as Paint Booth #4 (EU-04), for the spray application of sealers, installed in 2000, with two (2) separate spray guns, with a maximum capacity of 6.25 trophy and plaque units per hour, using less than 5 gallons of sealer per day, using fiberglass paint filters as control, and exhausting to stack S-14;

Note: The four (4) paint booths (EU-01, EU-02, EU-03, and EU-04) are considered separate facilities because they coat different products and do not operate in a sequence.

- (e) One (1) woodworking operation, identified as EU-05, consisting of one (1) CNC router, with a maximum throughput of 2,068 pounds of wood per hour, and two (2) Timesaver sanders, each with a maximum throughput of 3,255 pounds of wood per hour, using an integral baghouse (Murphy-Rodgers MRSE 4-drum dust collector) for particulate control, and exhausting to the atmosphere;
- (f) One (1) silk screen operation, installed in 1990, identified as EU-06, consisting of three (3) manual workstations for the hand application of silk-screened inks and clear coat, with a maximum throughput of 31 trophy and plaque units per hour, and exhausting indoors;
- (g) Six (6) space heaters, identified as H001 - H006, each with a maximum heat input rating of 0.09 million Btu per hour;
- (h) Three (3) space heaters, identified as H007 - H009, each with a maximum heat input rating of 0.10 million Btu per hour;
- (i) Two (2) CO₂ laser engravers for piecework engraving of wood, plastic, and acrylic parts; and
- (j) One (1) Instapak foam system for packing delicate trophies and plaques for shipping.
- (k) Paved roads and parking lots with public access.

"Integral Part of the Process" Determination

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 (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 were necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from the woodworking operation was calculated after consideration of the controls for purposes of determining permit level and applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Paint Booths (EU-01 to EU-04)	0.70	0.70	0.70	-	-	8.27	-	-	2.55	0.91 (Toluene)
Woodworking Operation (EU-05)	2.10	2.10	2.10	-	-	-	-	-	-	-
Silk Screen Operation (EU-06)	-	-	-	-	-	0.60	-	-	0.07	0.07 (Glycol Ether)
Natural Gas (H001 to H009)	0.01	0.03	0.03	0.002	0.36	0.02	0.30	435	0.007	0.006 (Hexane)
Paved Roads	0.02	0.004	0.001	-	-	-	-	-	-	-
Laser Engravers	-	-	-	-	-	-	-	-	-	-
Instapak Foam System	-	-	-	-	-	-	-	-	-	-
Total PTE of Entire Source	2.82	2.83	2.83	0.002	0.36	8.89	0.30	435	2.62	0.91 (Toluene)
Exemptions Levels**	5	5	5	10	10	10	25	100,000	25	10
Registration Levels**	25	25	25	25	25	25	100	100,000	25	10

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Parts and Products, 40 CFR 63, Subpart M MMM (326 IAC 20-80), are not included in the permit, since the source is not a major source of HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart H H H H H H H H, are not included in the permit, since the source does not perform paint stripping using methylene chloride (MeCl), spray application of coatings to motor vehicles and mobile equipment, or spray application of coatings that contain a target HAP (compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart X X X X X X, are not included in the permit, since the source does not use materials that have potential to emit metal fabrication or finishing HAP, as defined in 40 CFR 63.11522.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination - Entire Source

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)

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

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (h) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
The source is not subject to the requirements of 326 IAC 8-7-2 because it does not have the potential to emit equal or greater than one hundred (100) tons per year of VOC and does not have coating facilities that have potential to emit equal to or greater than ten (10) tons per year of VOC.

State Rule Applicability Determination - Individual Facilities

Paint Booths

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(15), all four (4) paint booths (EU-01, EU-02, EU-03, and EU-04) are exempt from 326 IAC 6-3-2 because they each use less than five (5) gallons per day.
- (b) 326 IAC 8-2-9 (Surface Coating VOC Emission Limitations: Miscellaneous Metal and Plastic Parts)
Pursuant to 326 IAC 8-2-1(a)(3), the provisions of 326 IAC 8-2-9 apply to miscellaneous metal coating operations existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter, or St. Joseph counties, and which have actual emissions of greater than fifteen (15) pounds per day before add-on controls. The potential to emit of Paint Booth #1 (EU-1) is greater than fifteen (15) pounds per day, but the source has opted to limit the VOC input to less than fifteen (15) pounds per day in order to render the requirements of 326 IAC 8-2-9 not applicable. Therefore, the owner or operator of this source shall comply with the following:
- (1) The VOC usage for Paint Booth #1 (EU-01) shall be limited to less than 15.0 pounds per day.

Compliance with this limit renders the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not applicable.

- (2) To document compliance with this limit, the owner or operator of this source shall maintain records for the total VOC usage for Paint Booth #1 (EU-01) each day. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for Paint Booth #1 (EU-01):
 - (A) The amount and VOC content of each coating material, dilution solvent, and cleanup solvent used for each day. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.
 - (B) The total VOC usage for each day.
- (3) Records of all required monitoring data, reports and support information required by this exemption 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 owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.
- (4) Unless otherwise specified in this exemption, all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval date of this exemption.

Paint Booth #2 (EU-02) existed as of July 1, 1990, is located in Floyd county, and coats metal parts and products. Paints Booths #3 and #4 (EU-03 and EU-04) were constructed after July 1, 1990, are located in any county, and coat metal parts and products. However, pursuant to 326 IAC 8-2-1(a)(3), Paint Booth #2 and pursuant to 326 IAC 8-2-1(a)(4), Paint Booths #3 and #4 are not subject to 326 IAC 8-2-9 because they each have potential and actual VOC emissions less than fifteen (15) pounds per day.

Woodworking Operation

- (c) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the woodworking operation is exempt from 326 IAC 6-3-2 because it has potential PM emissions less than five hundred fifty-one thousandths (0.551) pounds per hour after the integral baghouse.

The integral baghouse shall be in operation at all times the woodworking operation is in operation in order to ensure the woodworking operation is exempted from 326 IAC 6-3-2.

Silk Screen Operation

- (d) There are no other 326 IAC 8 Rules that are applicable to the silk screen operation.

Natural Gas Heaters

- (e) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired heaters are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.
- (f) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

- (g) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.
- (h) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired combustion units are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there are no applicable emission limits for the source under 326 IAC 9-1-2.
- (i) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired combustion units are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because they have potential to emit NO_x less than forty (40) tons per year.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows.

Emission Unit	Control Device	Monitoring	Frequency
Woodworking operation	Baghouse	Bag Inspections	Semi-Annual

These monitoring conditions are necessary, because the baghouse must operate to ensure exemption from 326 IAC 6-3-2 and to ensure compliance with 326 IAC 2-1.1 (Exemptions).

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 8, 2012. Additional information was received on November 20, 2012; November 26, 2012; November 30, 2012, and December 20, 2012.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. 043-32502-00064. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ryan Graunke 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Source Summary**

Company Name: AsemPac
Address City IN Zip: 5300 Foundation Blvd, New Albany, IN, 47150
Permit No.: 043-32502-00064
Reviewer: Ryan Graunke

Unlimited PTE for Entire Source												
Process	Emission Unit IDs	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Paint booths	EU-01 to EU-04	0.70	0.70	0.70	-	-	8.27	-	-	2.55	0.91	Toluene
Woodworking	EU-05	2.10	2.10	2.10	-	-	-	-	-	-	-	-
Silk screen	EU-06	-	-	-	-	-	0.60	-	-	0.07	0.07	Glycol Ether
Natural gas	H001 to H009	0.01	0.03	0.03	0.002	0.36	0.02	0.30	435	0.007	0.01	Hexane
Paved roads	N/A	0.02	0.004	0.001	-	-	-	-	-	-	-	-
Laser engravers	N/A	-	-	-	-	-	-	-	-	-	-	-
Instapak foam	N/A	-	-	-	-	-	-	-	-	-	-	-
Total		2.82	2.83	2.83	0.002	0.36	8.89	0.30	435	2.62	0.91	Toluene

Notes:

Laser engravers have no measureable emissions

Instapak foam system has no emissions according to the MSDSs provided by the source

Appendix A: Emissions Calculations
Paint booths - VOC and PM

Company Name: AsemPac
Address City IN Zip: 5300 Foundation Blvd, New Albany, IN, 47150
Permit No.: 043-32502-00064
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Specific Gravity	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % VOC	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Max usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Paint Booth #1	EU-01	Clear Coat Lacquer	0.89	7.43	76.7%	0.0%	76.7%	0.0%	84.6%	15.4%	0.010	6.25	1.5	5.69	5.69	37.00	0.36	8.54	1.56	0.12	75%
		Black Lacquer	1.57	13.10	81.0%	0.0%	81.0%	0.0%	11.4%	88.7%	0.010	6.25	1.5	10.62	10.62	11.98	0.66	15.92	2.91	0.17	75%
Paint Booth #2	EU-02	Mold Release	0.98	8.18	73.9%	0.0%	73.9%	0.0%	85.7%	14.3%	0.001	10.0	0.24	6.04	6.04	42.25	0.06	1.45	0.26	0.02	75%
		Water Based Glue	1.10	9.18	50.0%	45.0%	5.0%	49.5%	6.6%	43.9%	0.001	20.0	0.48	0.46	0.91	1.05	0.01	0.22	0.04	0.10	75%
Paint Booth #3	EU-03	VOC Glue*	N/D	6.60	56.9%	0.0%	56.9%	0.0%	65.8%	34.2%	0.001	20.0	0.48	3.76	3.76	10.98	0.08	1.80	0.33	0.06	75%
		Sealer (Gun #1)	0.89	7.45	77.9%	0.0%	77.9%	0.0%	84.9%	15.1%	0.010	6.25	1.5	5.80	5.80	38.41	0.36	8.70	1.59	0.11	75%
Paint Booth #4	EU-04	Sealer (Gun #2)	0.89	7.45	77.9%	0.0%	77.9%	0.0%	84.9%	15.1%	0.010	6.25	1.5	5.80	5.80	38.41	0.36	8.70	1.59	0.11	75%
		Totals:																1.89	45.34	8.27	0.70

Notes:

Paint Booth #1 could have been subject to 326 IAC 8-2-9 since it emits greater than 15 pounds of VOC per day, however, VOC emissions will be limited to less than 15 lbs/day to render 326 IAC 8-2-9 not applicable. All paint booths are exempt from 326 IAC 6-3-2 because they each have potential to use less than 5 gallons of coating per day

Methodology:

Density (lb/gal) (when not provided in MSDS) = Specific gravity * Density of water (8.345 lb/gal)
 Weight % Volatile (H₂O & Organics) = Weight % VOC + Weight % Water
 Volume % Water = Weight % Water * Density (lb/gal) / Density of water (8.345 lb/gal)
 Volume % VOC (when not provided in MSDS) = \sum (Coating density (lb/gal) * Weight % Individual VOC) / (Specific gravity of individual VOC * Density of water (8.345 lb/gal))
 *For Water Based Glue: 3.0% Toluene (Specific gravity = 0.866), 2.0% Methanol (Specific gravity = 0.791)
 *For VOC glue: 12.4% Toluene (Specific gravity = 0.866), 44.5% Hexane (Specific gravity = 0.659) (See note on Page 3 of this appendix)
 Volume % Solids = 1 - (Volume % VOC + Volume % Water)
 Max usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
 VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC
 VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)
 VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids
 PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
 PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
 PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
 PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Paint booths - HAPs**

Company Name: AsemPac
Address City IN Zip: 5300 Foundation Blvd, New Albany, IN, 47150
Permit No.: 043-32502-00064
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum (unit/hr)	Toulene		Glycol Ether		Ethylene Glycol		Xylene		Methanol		Hexane		
						% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	
Paint Booth #1	EU-01	Clear Coat Lacquer	7.43	0.010	6.25	5%	0.10	3%	0.06	-	-	-	-	-	-	-	-	-
		Black Lacquer	13.10	0.010	6.25	5%	0.18	10%	0.36	2%	0.07	31%	1.11	-	-	-	-	-
Paint Booth #2	EU-02	Mold Release	8.18	0.001	10.00	35%	0.13	5%	0.02	-	-	0.1%	0.000	-	-	-	-	
Paint Booth #3	EU-03	Water based glue	9.18	0.001	20.00	3%	0.02	-	-	-	-	-	-	2%	0.016	-	-	
		VOC Glue	6.60	0.001	20.00	12.4%	0.072	-	-	-	-	-	-	-	-	44.5%	0.257	
Paint Booth #4	EU-04	Sealer (Gun #1)	7.45	0.010	6.25	10%	0.20	-	-	-	-	-	-	-	-	-	-	
		Sealer (Gun #2)	7.45	0.010	6.25	10%	0.20	-	-	-	-	-	-	-	-	-	-	
Totals:							0.91		0.4376		0.07		1.1122		0.02		0.26	
																Total HAPs:	2.55	

Note:

MSDS of VOC glue provided Weight % VOC (56.9%) and Weight % Toluene (12.4%). Hexane is the only other VOC/HAP in the glue, so the difference was assumed to be Weight % Hexane as worst case.

Methodology:

PTE of HAP (ton/yr) = Density (lb/gal) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Woodworking Operation (CNC Router (EU-05) and Timesaver Sanders)**

Company Name: AsemPac
Address City IN Zip: 5300 Foundation Blvd, New Albany, IN, 47150
Permit No.: 043-32502-00064
Reviewer: Ryan Graunke

PTE of PM

Process	Actual operating time (hr/day)	Actual Sawdust Collected (lb/day)	Baghouse Efficiency	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (ton/yr)	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (ton/yr)
Woodworking	2.9	26.4	95%	9.58	42.0	0.48	2.10

Notes:

Consists of 1 CNC router (EU-05) and 2 Timesaver Sanders
Source collects 4 drums of sawdust every 3 weeks at 5 operating days per week and 99 lbs of sawdust per drum
Baghouse efficiency is not available. Conservatively assumed as 95%
Baghouse have been approved by IDEM as integral to the process so the controlled emissions are used to calculate PTE

Methodology:

Actual sawdust collected (lb/day) = 4 drums/3 weeks / 5 days/week * 99 lbs/drum
Uncontrolled PTE of PM (lb/hr) = Actual sawdust collected (lb/day) / Actual operating time (hr/day) / Baghouse efficiency
Uncontrolled PTE of PM (ton/yr) = Uncontrolled PTE of PM (lb/hr) * 8760 hours/yr * 1 ton/2000 pounds
Controlled PTE of PM (lb/hr) = Uncontrolled PTE of PM (lb/hr) * (1 - Baghouse efficiency)
Controlled PTE of PM (ton/yr) = Uncontrolled PTE of PM (ton/yr) * (1 - Baghouse efficiency)

Router Max Throughput

Emission Unit	Working area (in ²)	Z-axis clearance (in)	Line speed (piece/hr)	Max Throughput (in ³ /hr)	Max Throughput (ft ³ /hr)	Wood density (lb/ft ³) ^a	Max Throughput (lb/hr)
Router	4608	6	2.308	63803.1	36.92	56	2067.69

Notes:

Max working area is 48 in. x 96 in.
Line speed is based on a 26 minute cycle per piece, as provided by source
^aOak is the densest wood used at the facility. Density (lb/ft³) from: http://www.engineeringtoolbox.com/wood-density-d_40.html

Methodology:

Max throughput (in³/hr) = Working area (in²) * Z-axis clearance (in) * Line speed (piece/hr)
Max throughput (ft³/hr) = Max throughput (in³/hr) * 1 ft³/1728 in³
Max throughput (lb/hr) = Max throughput (ft³/hr) * Wood density (lb/ft³)

Sander Max Throughput

Emission Unit	Bed width (in)	Max board thickness (in)	Line speed (in/sec)	Max Throughput (in ³ /sec)	Max Throughput (ft ³ /hr)	Wood density (lb/ft ³) ^a	Max Throughput (lb/hr)
Sander	36	5	0.155	27.9	58.13	56	3255.00

Notes:

Line speed is 1/32 in. per 6 sec, as provided by the source
^aOak is the densest wood used at the facility. Density (lb/ft³) from: http://www.engineeringtoolbox.com/wood-density-d_40.html

Methodology:

Max throughput (in³/sec) = Bed width (in) * Max board thickness * Line speed (in/sec)
Max throughput (ft³/hr) = Max throughput (in³/sec) * 3600 sec/hr * 1 ft³/1728 in³
Max throughput (lb/hr) = Max throughput (ft³/hr) * Wood density (lb/ft³)

Appendix A: Emissions Calculations
Silk screen (EU-06) - VOC

Company Name: AsemPac
Address City IN Zip: 5300 Foundation Blvd, New Albany, IN, 47150
Permit No.: 043-32502-00064
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)
Silk Screen	EU-06	Ink - Worst case	8.20	72.0%	0%	72.0%	0%	22.0%	0.0004	31.00	5.90	5.90	26.82	0.07	1.76	0.32
		Clear coat	8.13	63.0%	0%	63.0%	0%	36.4%	0.0004	31.00	5.12	5.12	14.09	0.06	1.52	0.28
		Retarder*	8.65	100.0%	0%	100.0%	0%	0%	0.0000	31.00	8.65	8.65	-	0.00	0.00	0.00
		Catalyst*	9.58	33.0%	0%	33.0%	0%	74%	0.0000	31.00	3.16	3.16	4.27	0.00	0.00	0.00
		Thinner - for cleanup*	7.74	100.0%	0%	100.0%	0%	0%	0.0000	31.00	7.74	7.74	-	0.00	0.00	0.00
Totals:														0.14	3.28	0.60

Notes:

*Applied in de-mimus amounts (drop/batch) to the ink
Worst case ink for VOC is 9HTB Halftone blue
Coatings are hand-applied, therefore, there are no applicable transfer efficiencies or measureable PM emissions

Methodology:

Weight % Volatile (H₂O & Organics) = Weight % VOC + Weight % Water
Weight % VOC (for ink) = VOC content (lb/gal coating) / Density (lb/gal)
Volume % Solids (for ink and clear coat) = 1 - Volume % Volatiles (78% and 63.65% for ink and clear coat, respectively, as reported in the MSDS)
VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC, or provided by MSDS (ink)
VOC content (lb/gal coating less coating) = VOC content (lb/gal coating) / (1-Volume % Water)
VOC content (lb/gal coating solids) = VOC content (lb/gal coating) / Volume % Solids
PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)
PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day
PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs
PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hour) Density (lb/gal) * (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Silk screen (EU-06) - HAPs

Company Name: AsemPac
Address City IN Zip: 5300 Foundation Blvd, New Albany, IN, 47150
Permit No.: 043-32502-00064
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Glycol Ethers	
						% Weight	PTE (ton/yr)
Silk Screen	EU-06	Ink - Worst case	8.20	0.0004	31.00	15%	0.07
		Clear coat	8.13	0.0004	31.00	-	-
		Retarder*	8.65	0.0000	31.00	-	-
		Catalyst*	9.58	0.0000	31.00	-	-
		Thinner - for cleanup*	7.74	0.0000	31.00	-	-
Total:							0.07

Notes:

*Applied in de-mimus amounts (drop/batch)

Worst case Weight % HAP is the high end of range of all inks as provided in the MSDS

Methodology:

PTE of HAP (ton/yr) = Weight % HAP * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * 8760 hrs/yr * 1 ton/2000 lbs

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

Company Name: AsemPac
Address City IN Zip: 5300 Foundation Blvd, New Albany, IN, 47150
Permit No.: 043-32502-00064
Reviewer: Ryan Graunke

Emission unit	Emission Unit ID	Number of Unit	Heat Input Capacity Each (MMBtu/hr/unit)	Total Potential Throughput (MMCF/yr)
Space Heater	H001-6	6	0.09	4.6
Space Heater	H007-H009	3	0.10	2.6
Total			0.84	7.2

	Pollutant						
	PM*	PM ₁₀ *	direct PM _{2.5} *	SO ₂	NO _x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr)	0.01	0.03	0.03	0.0	0.4	0.0	0.3

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM₁₀ combined. PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission (tons/yr)	7.575E-06	4.328E-06	2.705E-04	6.493E-03	1.226E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr)	1.804E-06	3.968E-06	5.050E-06	1.371E-06	7.575E-06
Total HAPs:					6.807E-03

	Greenhouse Gas		
	CO ₂	CH ₄	N ₂ O
Emission Factor (lb/MMCF)	120,000	2.3	2.2
Potential Emission (tons/yr)	433	0.0	0.0
Summed Potential Emissions (tons/yr)	433		
CO ₂ e Total (tons/yr)	435		

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Total Heat Input Capacity = ∑ (Heat Input Capacity Each (MMBtu/hr) * Number of Units)

Potential Throughput (MMCF) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1,020 MMBtu)

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

Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

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
Fugitive Dust Emissions - Paved Roads**

Company Name: AsemPac
Address City IN Zip: 5300 Foundation Blvd, New Albany, IN, 47150
Permit No.: 043-32502-00064
Reviewer: Ryan Graunke

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Max number of vehicles per day	Number of one-way trips per day per vehicle	Max one-way trips per day (trip/day)	Max weight loaded (tons/trip)	Total weight driven per day (ton/day)	Max one-way distance (feet/trip)	Max one-way distance (mi/trip)	Max one-way miles (mi/day)	Max one-way miles (mi/yr)
Box truck (entering plant) (one-way trip)	1	4	4	1.0	4.0	136	0.026	0.1	37.6
Box truck (leaving plant) (one-way trip)	1	4	4	1.0	4.0	136	0.026	0.1	37.6
Passenger vehicle (entering plant) (one-way trip)	20	1	20	1.0	20.0	136	0.026	0.5	188.0
Passenger vehicle (leaving plant) (one-way trip)	20	1	20	1.0	20.0	136	0.026	0.5	188.0
Totals			48		48.0			1.2	451.3

Average vehicle weight per trip = tons/trip
Average miles per trip = miles/trip

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

	PM	PM ₁₀	PM _{2.5}	
where k =	0.011	0.0022	0.00054	= particle size multiplier (lb/vehicle miles traveled) (AP-42 Table 13.2.1-1)
W =	1.0	1.0	1.0	= average vehicle weight (tons)
sL =	9.7	9.7	9.7	= silt loading value (g/m ²) for paved roads at iron and steel production facilities - (AP-42 Table 13.2.1-3)

Mitigated emission factor takes natural mitigation due to precipitation into consideration

Mitigated Emission Factor, $E_{ext} = E_i * [1 - (p / 4 * N)]$ (Equation 2 from AP-42 13.2.1)

where p = days of rain greater than or equal to 0.01 inches (see AP-42 Figure 13.2.1-2)
N = days per year

	PM	PM ₁₀	PM _{2.5}	
Unmitigated Emission Factor, E_i (lb/mi) =	0.087	0.017	0.0043	lb/mile
Mitigated Emission Factor, E_{ext} (lb/mi) =	0.080	0.016	0.0039	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM ₁₀ (tons/yr)	Unmitigated PTE of PM _{2.5} (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM ₁₀ (tons/yr)	Mitigated PTE of PM _{2.5} (tons/yr)
Box truck (entering plant) (one-way trip)	1.64E-03	3.27E-04	8.03E-05	1.50E-03	2.99E-04	7.34E-05
Box truck (leaving plant) (one-way trip)	1.64E-03	3.27E-04	8.03E-05	1.50E-03	2.99E-04	7.34E-05
Passenger vehicle (entering plant) (one-way trip)	8.18E-03	1.64E-03	4.01E-04	7.48E-03	1.50E-03	3.67E-04
Passenger vehicle (leaving plant) (one-way trip)	8.18E-03	1.64E-03	4.01E-04	7.48E-03	1.50E-03	3.67E-04
Totals:	1.96E-02	3.92E-03	9.63E-04	0.0179	3.59E-03	8.81E-04

Methodology:

Max one-way trips per day (trip/day) = Max number of vehicles per day * Number of one-way trips per day
 Total weight driven per day (ton/day) = Max weight loaded (tons/trip) * Max one-way trips per day (trip/day)
 Max one-way distance (mi/trip) = Max one-way distance (feet/trip) * 1 mi/5280 ft
 Max one-way miles (mi/day) = Max one-way trips per day (trip/day) * Max one-way distance (mi/trip)
 Max one-way miles (mi/yr) = Max one-way miles (mi/day) * 365 days/yr
 Average vehicle weight per trip (ton/trip) = \sum Total weight driven per day (ton/day) / \sum Max trips per day (trip/day)
 Average miles per trip (miles/trip) = \sum Max one-way distance (miles/day) / \sum Max trips per day (trip/day)
 Unmitigated PTE (tons/yr) = Max one-way miles (miles/yr) * Unmitigated emission factor (lb/mile) * (1 ton/2000 lbs)
 Mitigated PTE (tons/yr) = Max one-way miles (miles/yr) * Mitigated emission factor (lb/mile) * (1 ton/2000 lbs)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
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: Rick Cochran
AsemPac
5300 Foundation Boulevard
New Albany, IN 47150

DATE: January 24, 2013

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

SUBJECT: Final Decision
Exemption Construction and Operation Status
043-32502-00064

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:
Gary Parks, Responsible Official
Jennifer Triplett
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

Mail Code 61-53

IDEM Staff	PWAY 1/24/2013 AsemPac 043-32502-00064 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Rick Cochran AsemPac 1909 McDonald Ln New Albany IN 47150 (Source CAATS)										
2		Gary Parks COO AsemPac 1909 McDonald Ln New Albany IN 47150 (RO CAATS)										
3		Mr. Robert Bottom Paddlewheel Alliance P.O. Box 35531 Louisville KY 40232-5531 (Affected Party)										
4		Floyd County Commissioners 2524 Corydon Pike, Ste 204 New Albany IN 47150 (Local Official)										
5		New Albany City Council and Mayors Office City County Building #316 New Albany IN 47150 (Local Official)										
6		Floyd County Health Department 1917 Bono Rd New Albany IN 47150-4607 (Health Department)										
7		Ms. Sue Green 1985 Kopley Road Georgetown IN 47122 (Affected Party)										
8		Jennifer Triplett Environmental Compliance Source PO Box 6849 New Albany In 47150 (Consultant)										
9		L & D Mail Masters 110 Security Parkway New Albany IN 47150 (Affected Party)										
10		Hitachi Cable 5300 Grantline Road New Albany IN 47150 (Affected Party)										
11		Van Hout USA 6000 Foundation Blvd New Albany IN 47150 (Affected Party)										
12		Bert Huncilman & Son 115 Security Parkway New Albany IN 47150 (Affected Party)										
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