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: February 28, 2013

RE: Bed Techs, Inc. / 029-32596-00044

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07

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New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

Bed Techs Inc.
551 Minger Drive
Greendale, Indiana 47025

(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.: MSOP No. 029-32596-00044	
Issued by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 28, 2013 Expiration Date: February 28, 2018

TABLE OF CONTENTS

A. SOURCE SUMMARY.....4
A.1 General Information [326 IAC 2 5.1 3(c)][326 IAC 2 6.1 4(a)]
A.2 Emission Units and Pollution Control Equipment Summary

B. GENERAL CONDITIONS.....5
B.1 Definitions [326 IAC 2 1.1 1]
B.2 Revocation of Permits [326 IAC 2 1.1 9(5)]
B.3 Affidavit of Construction [326 IAC 2 5.1 3(h)] [326 IAC 2 5.1 4]
B.4 Permit Term [326 IAC 2 6.1 7(a)][326 IAC 2 1.1 9.5][IC 13 15 3 6(a)]
B.5 Term of Conditions [326 IAC 2 1.1 9.5]
B.6 Enforceability
B.7 Severability
B.8 Property Rights or Exclusive Privilege
B.9 Duty to Provide Information
B.10 Annual Notification [326 IAC 2 6.1 5(a)(5)]
B.11 Preventive Maintenance Plan [326 IAC 1 6 3]
B.12 Termination of Right to Operate [326 IAC 2 6.1 7(a)]
B.13 Permit Renewal [326 IAC 2 6.1 7]
B.14 Permit Amendment or Revision [326 IAC 2 5.1 3(e)(3)][326 IAC 2 6.1 6]
B.15 Source Modification Requirement
B.16 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]
B.17 Transfer of Ownership or Operational Control [326 IAC 2 6.1 6]
B.18 Annual Fee Payment [326 IAC 2 1.1 7]
B.19 Credible Evidence [326 IAC 1 1 6]

C. SOURCE OPERATION CONDITIONS.....10

Emission Limitations and Standards [326 IAC 2 6.1 5(a)(1)]
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6 3 2]
C.2 Permit Revocation [326 IAC 2 1.1 9]
C.3 Opacity [326 IAC 5 1]
C.4 Open Burning [326 IAC 4 1] [IC 13 17 9]
C.5 Incineration [326 IAC 4 2] [326 IAC 9 1 2]
C.6 Fugitive Dust Emissions [326 IAC 6 4]
C.7 Asbestos Abatement Projects [326 IAC 14 10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2 6.1 5(a)(2)]
C.8 Performance Testing [326 IAC 3 6]

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

Compliance Monitoring Requirements [326 IAC 2 6.1 5(a)(2)]
C.10 Compliance Monitoring [326 IAC 2 1.1 11]
C.11 Instrument Specifications [326 IAC 2 1.1 11]

Corrective Actions and Response Steps
C.12 Response to Excursions or Exceedances
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2 6.1 5(a)(2)]
C.14 Malfunctions Report [326 IAC 1 6 2]
C.15 General Record Keeping Requirements [326 IAC 2 6.1 5]
C.16 General Reporting Requirements [326 IAC 2 1.1 11] [326 IAC 2 6.1 2] [IC 13 14 1 13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS.....16

Emission Limitations and Standards [326 IAC 2 6.1 5(a)(1)]
D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8 2 9
D.1.2 Work Practices Requirements [326 IAC 8-2-9
D.1.3 Particulate Emissions [326 IAC 6-3-2(d)]
D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements
D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance Monitoring Requirements [326 IAC 2 6.1 5(a)(2)]
D.1.6 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2 6.1 5(a)(2)]
D.1.7 Record Keeping Requirement

Annual Notification.....19
Malfunction Report..... 20
Affidavit of Construction.....22

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 source that will refurbish old and used hospital beds and associated on-board electronic system.

Source Address:	551 Minger Drive, Greendale, Indiana 47025
General Source Phone Number:	(812) 926-0296
SIC Code:	3479
County Location:	Dearborn
Source Location Status:	Nonattainment for ozone - Lawrenceburg Township-Greendale is in Lawrenceburg Township Attainment for all other 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 source consists of the following emission units and pollution control devices:

(a) Two (2) paint booths, identified as PB1 and PB2 approved in 2013 for construction, with a maximum capacity of 4 bed units or separate components per hour, each is equipped with a High Volume Low Pressure (HVLP) gun, particulate overspray controlled by cartridge filter both exhausting to four (4) stacks, S-11, S-12, S-13 and S-14.

(b) Seventeen (17) air make up units, approved in 2013 for construction, six (6) with a total heat input capacity of 1.5 million British thermal units (MMBtu/hr), identified as RTU1 through RTU 6; seven (7) with a total heat input capacity of 0.5 MMBtu/hr, identified as F1 through F7; three (3) with a total heat input capacity of 1.2 MMBtu/hr, identified as UH1 through UH3 and one (1) with a heat input capacity of 4.3 MMBtu/hr, identified as Paint Return.

(c) Two (2) metal inert gas (MIG) welding stations, identified as W1 and W2, approved in 2013 for construction, with a total maximum electrode consumption of 0.04 pound per hour, each station is controlled by cartridge filters, exhausting inside the building.

(d) Three (3) soldering units, identified as KISS Soldering Unit with a maximum throughput rate of 10 electronic boards per hour, Wave Soldering Unit with a maximum throughput rate of 20 electronic boards per hour and Placer Soldering Unit with a maximum throughput rate of 20 electronic boards per hour, approved in 2013 for construction.

(e) Sanding operation, identified as SA, with process weight rate less than 100 pounds per hour, using electric sander and manual hand sanding for all refurbishing operations. Particulate emission from sanding activities is controlled by cartridge filter, approved in 2013 for construction.

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

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

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

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, MSOP No. 029-32596-00044, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 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.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 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.13 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.14 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.15 Source Modification Requirement

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

B.16 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.17 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.18 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.19 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 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.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

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

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

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

C.10 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.11 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.12 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.13 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.14 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.15 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. Support information includes the following:
  (AA) All calibration and maintenance records.
  (BB) All original strip chart recordings for continuous monitoring instrumentation.
  (CC) Copies of all reports required by the.

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

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner

makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) paint booths, identified as PB1 and PB2 approved in 2013 for construction, with a maximum capacity of 4 bed units or separate components per hour, each is equipped with a High Volume Low Pressure (HVLP) gun, particulate overspray controlled by cartridge filter both exhausting to four (4) stacks, S-11, S-12, S-13 and S-14.

(b) Seventeen (17) air make up units, approved in 2013 for construction, six (6) with a total heat input capacity of 1.5 million British thermal units (MMBtu/hr), identified as RTU1 through RTU 6; seven (7) with a total heat input capacity of 0.5 MMBtu/hr, identified as F1 through F7; three (3) with a total heat input capacity of 1.2 MMBtu/hr, identified as UH1 through UH3 and one (1) with a heat input capacity of 4.3 MMBtu/hr, identified as Paint Return.

(c) Two (2) metal inert gas (MIG) welding stations, identified as W1 and W2, approved in 2013 for construction, with a total maximum electrode consumption of 0.04 pound per hour, each station is controlled by cartridge filters, exhausting inside the building.

(d) Three (3) soldering units, identified as KISS Soldering Unit with a maximum throughput rate of 10 electronic boards per hour, Wave Soldering Unit with a maximum throughput rate of 20 electronic boards per hour and Placer Soldering Unit with a maximum throughput rate of 20 electronic boards per hour, approved in 2013 for construction.

(e) Sanding operation, identified as SA, with process weight rate less than 100 pounds per hour, using electric sander and manual hand sanding for all refurbishing operations. Particulate emission from sanding activities is controlled by cartridge filter, approved in 2013 for construction.

(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 Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of the following limit:

(a) The VOC emissions from spray paint booths, PB1 and PB2 shall not exceed three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, for air dried or forced warm air dried coatings.

D.1.2 Work Practices 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:

(a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(b) 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.

(c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring thatequipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.3 Particulate Emissions [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate overspray emissions from spray paint booths, PB1 and PB2 shall be controlled by dry particulate filter, waterwash, or an equivalent control device, subject in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan, is required for spray paint booths and their respective control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC emission limits in Conditions D.1.1 shall be determined with the following equations:

$$A = [\sum_{i=1}^{n} (C_i \times U_i) / \sum_{i=1}^{n} U_i]$$

Where:

A = the volume weighted average in pounds VOC per gallon less water as applied;
C_i = the VOC content of the coating $_i$ in pounds of VOC per gallon of coating less water, as applied;
U_i = the usage rate of the coating $_i$ in gallons per month.

(b Compliance with the VOC content 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.

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

D.1.6 Monitoring

(a) If overspray is visibly detected at the spray paint booths stack (S-11) exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(b) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.

(1) The VOC content of each coating material used and solvent added to coatings

(2) The amount of coating material and solvent less water used on a monthly basis.

(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) To document the compliance status with Condition D.1.6, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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:	Bed Techs Inc.
Address:	551 Minger Drive
City:	Greendale, Indiana
Phone #:	(812) 926-0296
MSOP #:	MSOP No. 029-32596-00044

I hereby certify that Bed Techs Inc. is :

□ still in operation.
□ no longer in operation.

I hereby certify that Bed Techs Inc. is :

□ in compliance with the requirements of MSOP MSOP No. 029-32596-00044.
□ not in compliance with the requirements of MSOP MSOP No. 029-32596-00044.

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?_____,6 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:

_____
_____

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

Bed Techs Inc.
551 Minger Drive
Greendale, Indiana 47025

Affidavit of Construction

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

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

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

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

4. I hereby certify that Bed Techs Inc ., 551 Minger Drive, Greendale, Indiana 47025, completed construction of the plant that will refurbish old and used hospital beds and associated on- board electronic system on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on December 6, 2012 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. 029-32596, Plant ID No. 029-00044 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____
Name_____ (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a New Source Construction
and Minor Source Operating Permit

Source Name:	**Bed Techs Inc.**
Source Location:	**551 Minger Drive, Greendale, IN 47025**
County:	**Dearborn**
SIC Code:	**3479**
MSOP No.:	**029-32596-00044**
Permit Reviewer:	**Aida DeGuzman**

On January 24, 2013, the Office of Air Quality (OAQ) had a notice published in the Dearborn County Register, Lawrenceburg, Indiana stating that Bed Techs Inc. applied for a New Source Construction and Minor Source Operating Permit. This permit will allow Bed Techs Inc, to construct and operate a new stationary source that will refurbish old and used hospital beds and associated on-board electronic system.

The notice also stated that OAQ proposed to issue a permit for this new source and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

IDEM, OAQ has made a change to fix the typographical error in the permit term found in Condition B.4 of the proposed permit. The proposed condition allowed for a fixed term of ten (10) years from the issuance date of this permit. Pursuant to 326 IAC 2-6.1-7(a), a new operating permit shall only be valid for period of time not to exceed five (5) years, while an operating permit renewal shall be valid for a period of time not to exceed ten (10) years. Therefore, Condition B.4 has been revised as shown below. Additions are **bolded** and deletions are struck-through for emphasis:

B.4 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, MSOP No. 029-32596-00044, is issued for a fixed term of ~~ten (10)~~ **five (5)** years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	**Bed Techs Inc.**
Source Location:	**551 Minger Drive, Greendale, IN 47025**
County:	**Dearborn**
SIC Code:	**3479**
MSOP No.:	**029-32596-00044**
Permit Reviewer:	**Aida DeGuzman**

On December 6, 2012 the Office of Air Quality (OAQ) received an application from Bed Techs, Inc. related to the construction and operation of a new stationary plant that will refurbish old and used hospital beds and associated on-board electronic system.

County Attainment Status

The source is located in Lawrenceburg Township, Dearborn County.

Pollutant	Designation
SO_2	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Attainment effective May 11, 2010, for the 8-hour ozone standards.[1]
$PM_{2.5}$	Attainment effective December 23, 2011, for the annual $PM_{2.5}$ standard for Lawrenceburg Township
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

(a) Ozone Standards

U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Dearborn County Lawrenceburg Township as nonattainment for ozone. On August 1, 2012 the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective, August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against US EPA in the US Court of Appeals for the DC Circuit on July 19, 2012. 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 designation. Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(b) $PM_{2.5}$

Dearborn 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 SO_2 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
Dearborn 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 2-6.1 (Minor Source Operating Permits) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Bed Techs, Inc. on December 6, 2012, relating to a new stationary used hospital beds and associated on-board electronic refurbishment. IDEM, OAQ is issuing a Minor Source Operating Permit (MSOP) since the source's potential to emit volatile organic compounds (VOC) are equal to or greater than 25 tons per year but less than 100 tons per year.

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

(a) Two (2) paint booths, identified as PB1 and PB2 approved in 2013 for construction, with a maximum capacity of 4 bed units or separate components per hour, each is equipped with a High Volume Low Pressure (HVLP) gun, particulate overspray controlled by cartridge filter both exhausting to four (4) stacks, S-11, S-12, S-13 and S-14.

(b) Seventeen (17) air make up units, approved in 2013 for construction, six (6) with a total heat input capacity of 1.5 million British thermal units (MMBtu/hr), identified as RTU1 through RTU 6; seven (7) with a total heat input capacity of 0.5 MMBtu/hr, identified as F1 through F7; three (3) with a total heat input capacity of 1.2 MMBtu/hr, identified as UH1 through UH3 and one (1) with a heat input capacity of 4.3 MMBtu/hr, identified as Paint Return.

(c) Two (2) metal inert gas (MIG) welding stations, identified as W1 and W2, approved in 2013 for construction, with a total maximum electrode consumption of 0.04 pound per hour, each station is controlled by cartridge filters, exhausting inside the building.

(d) Three (3) soldering units, identified as KISS Soldering Unit with a maximum throughput rate of 10 electronic boards per hour, Wave Soldering Unit with a maximum throughput rate of 20 electronic boards per hour and Placer Soldering Unit with a maximum throughput rate of 20 electronic boards per hour, approved in 2013 for construction.

(e) Sanding operation, identified as SA, with process weight rate less than 100 pounds per hour, using electric sander and manual hand sanding for all refurbishing operations. Particulate emission from sanding activities is controlled by cartridge filter, approved in 2013 for construction.

Enforcement Issues

There are no pending enforcement actions related to this proposed new plant.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination –Minor Source Operating Permit

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	PM10*	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Paint Booths (PB1 and PB2)	6.09	6.09	6.09	--	--	11.33	--	--	2.36	0.61 each toluene and methanol
Combustion Units	0.06	0.24	0.24	0.02	3.21	0.18	2.70	777.65	0.01	0.01 Hexane
Welding Stations	0.001	0.001	0.001	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Soldering Operation	1.10	1.10	1.10	--	--	23.53	--	--	1.10	1.10 lead
Sanding Operation	1.65	1.65	1.65	--	--	--	--	--	--	--
Total PTE of Entire Source	**8.9**	**9.09**	**9.09**	**0.02**	**3.21**	**35.04**	**2.70**	**777.65**	**3.46**	**1.10 lead**
Title V Major Source Thresholds**	NA	100	100	100	100	100	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 CO_2e 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 VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

(b) 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 CO_2 equivalent (CO_2e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM10*	PM2.5	SO_2	NOx	VOC	CO	GHGs as CO_2e**	Total HAPs	Worst Single HAP
Paint Booths (PB1 and PB2)	0.03	0.03	0.03	--	--	11.33	--	--	2.36	0.61 each toluene and methanol
Combustion Units	0.06	0.24	0.24	0.02	3.21	0.18	2.70	777.65	0.01	0.01 Hexane
Welding Stations	0.001	0.001	0.001	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Soldering Operation	1.10	1.10	1.10	--	--	23.53	--	--	1.10	1.10 lead
Sanding Operation	0.01	0.01	0.01	--	--	--	--	--	--	--
Total PTE of Entire Source	**1.2**	**1.38**	**1.38**	**0.02**	**3.21**	**35.04**	**2.70**	**777.65**	**3.46**	**1.10 lead**
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
Emission Offset/ Nonattainment NSR Major Source Thresholds	--	--	--	--	--	100	--	--	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**The 100,000 CO_2e 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) No regulated pollutant is emitted at Part 70, PSD and Emission Offset threshold levels.

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)

(a) 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal fabrication and Finishing Source Categories

This rule applies to new and existing area sources of HAPs that are primarily engaged in manufacturing fabricated metal products, electrical and electronic equipment, power marine boilers, pressure and nonpressure tanks, processing and storage vessels, heat exchangers, and other similar products, structural metals and heating equipment except electric.

The proposed new plant is not subject to this rule because it is not engaged in fabrication of metal products. This source is only refurbishing old and used hospital beds.

(b) 40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

This rule applies to an area source of HAP that performs one or more of the following activities:

(1) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;

(2) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

(3) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

The proposed new source is not subject to this rule because it does use coatings containing the target HAP in refurbishing and painting hospital beds.

(c) 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)

(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.

State Rule Applicability Determination

(a) 326 IAC 2-6.1 (Minor Source Operating Permit (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP 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 thirty percent (30%) 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 8-2-9 (Miscellaneous Metal Coating)
The source is subject to 326 IAC 8-2-9, because its construction commences after July 1, 1990, and have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

(1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the spray booths, PB1 and PB2 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

(2) 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 be limited to, the following:

(i) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(ii) 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.

(iii) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(iv) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(v) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring thatequipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

(g) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
This rule applies to new facilities constructed as of January 1, 1980 with potential VOC emissions of 25 tons/year, located anywhere in the state and are not regulated by any article in 326 IAC 8, 326 IAC 20-48 or 326 IAC 20-56.

The proposed soldering operation, which consists of three (3) soldering units (KISS Soldering Units, Wave Soldering Unit and Placer Soldering unit) is not subject to 326 IAC 8-1-6, because its potential VOC emissions are not 25 tons/year or greater. Note: The total VOC potential emissions are 23.53 tons/year.

(h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate overspray emissions from spray paint booths, PB1 and PB2 shall be controlled by dry particulate filter, waterwash, or an equivalent control device, subject to the following:

(1) The Permittee shall operate the control device in accordance with manufacturer's specifications.

(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(1) The proposed welding operation is not subject to 326 IAC 6-3-2 because section 1 of this rule specifically exempts welding operation using less than 625 pounds of weld rod per day. The proposed welding operation uses 0.48 pound per day of weld rod which is well below 625 pounds per day.

(2) 326 IAC 6-3-2(b)(14), specifically exempts manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour. The proposed soldering operation is not subject to326 IAC 6-3-2 because its potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

(3) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the sanding operation, identified as SA, with maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(i) 326 IAC 6-2 (Particulate Emission Limitations for Indirect Heating Facilities)
The heating units are not subject to 326 IAC 6-2 because they are not sources of indirect heating.

Compliance Determination, Monitoring and Testing Requirements

There are no compliance determination and monitoring requirements applicable to this proposed new 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 December 6, 2012.

The construction and operation of this source shall be subject to the conditions of the attached MSOP No. 029-32595-00044. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Aida DeGuzman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4972 or toll free at 1-800-451-6027, extension 3-4972.

(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

Company Name: Bed Techs Inc.
Address City IN Zip: 551 Minger Drive, Greendale, IN 47025
MSOP No.: 029-32596
Plt ID: 029-00044
Reviewer: Aida DeGuzman
Date: Dec. 12, 2012

SUMMARY OF EMISSIONS (tons/year)

Emission Unit ID	Uncontrolled PTE											
	CO	NOx	SO2	PM	PM10	PM2.5	VOC	Lead	Single Worst HAP		Combined HAPs	GHG (CO2e)
Paint Booths (PB1, PB2)	-	-	-	6.09	6.09	6.09	11.33		0.61	Each Toluene & Methanol	2.35	-
Natural Gas Combustion	2.70	3.21	0.02	0.06	0.24	0.24	0.18	-	0.01	Hexane	0.01	777.65
Welding Operation	-	-	-	0.0010	0.0010	0.0010	-	-	-		-	-
Soldering Operation	-	-	-	1.10	1.10	1.10	23.53	1.10	1.10	lead	1.10	-
Sanding Operation	-	-	-	1.65	1.65	1.65	-	-	-	-	-	-
TOTAL UNCONTROLLED PTE	**2.70**	**3.21**	**0.02**	**8.90**	**9.09**	**9.09**	**35.04**	**1.10**	**1.10**	**lead**	**3.46**	**777.65**

Emission Unit ID	Controlled PTE											
	CO	NOx	SO2	PM	PM10	PM2.5	VOC	Lead	Single Worst HAP		Combined HAPs	GHG (CO2e)
Paint Booths (PB1, PB2)	-	-	-	0.03	0.03	0.03	11.33		0.61	Each Toluene & Methanol	2.35	-
Natural Gas Combustion	2.70	3.21	0.02	0.06	0.24	0.24	0.18	-	0.01	Hexane	0.01	777.65
Welding Operation	-	-	-	0.0010	0.0010	0.0010	-	-	-		-	-
Soldering Operation	-	-	-	1.10	1.10	1.10	23.53	1.10	1.10	lead	1.10	-
Sanding Operation				0.01	0.01	0.01	-	-	-	-	-	-
TOTAL CONTROLLED PTE	**2.70**	**3.21**	**0.02**	**1.20**	**1.38**	**1.38**	**35.04**	**1.10**	**1.10**	**lead**	**3.46**	**777.65**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Bed Techs Inc.
Address City IN Zip: 551 Minger Drive, Greendale, IN 47025
MSOP No.: 029-32596
Plt ID: 029-00044
Reviewer: Aida DeGuzman
Date: Dec. 12, 2012

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Paint Booths (PB1, PB2)																
Primer KA91271HS	10.7	44.64%	24.2%	20.4%	36.0%	34.34%	0.01700	4.000	3.41	2.18	**0.15**	3.56	**0.7**	0.44	6.36	75%
Paint KA270HS	8.7	76.20%	66.5%	9.7%	75.8%	12.30%	0.54000	4.000	3.49	0.84	**1.82**	43.75	**7.98**	4.90	6.86	75%
Touch Up Paint (KA646HS	8.5	78.81%	69.2%	9.6%	76.2%	12.17%	0.04600	4.000	3.43	0.82	**0.15**	3.61	**0.66**	0.36	6.71	75%
Primer 41288HS	7.3	98.25%	97.0%	1.3%	97.2%	1.46%	0.01700	4.000	3.26	0.09	0.01	0.15	0.03	0.01	6.25	75%
Primer KA241HS	8.6	77.87%	68.4%	9.5%	76.1%	12.35%	0.04600	4.000	3.41	0.81	0.15	3.60	0.7	0.38	6.59	75%
Cleaning Solvent (#10 thinner)	6.9	100.00%	0.0%	100.0%	0.0%	0.00%	0.01700	4.000	6.86	6.86	0.47	11.19	2.04	0.00	-	100%
State Potential Emissions			**Add worst case coating to all solvents**							**Uncontrolled PTE**	**2.74**	**65.85**	**11.33**	**6.09**		
			Particulate overspray emissions are controlled by cartridge filters						**99.5% control efficiency**			**Controlled PTE**	**11.33**	**0.03**		

Coatings used for the operation in each booth is a primer, paint and touchup paint.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Bed Techs Inc.
Address City IN Zip: 551 Minger Drive, Greendale, IN 47025
MSOP No.: 029-32596
Plant ID N.: 029-00044
Reviewer: Aida DeGuzman
Date: Dec. 12, 2012

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum Unit/hour	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Primer 41288HS	7.25	0.017000	4.00	1.02%	0.00%	0.00%	0.24%	0.00%	0.00%	0.00%	0.02	0.00	0.00	0.01	0.00	0.00	0.00
#10 Thinner	6.858	0.017000	4.00	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	30.00%	0.00	0.61	0.00	0.00	0.00	0.00	0.61
Total State Potential Emissions											**0.02**	**0.61**	**0.00**	**0.01**	**0.00**	**0.00**	**0.61**
															Worst Single HAP	**0.61**	**Toluene**
																0.61	**Toluene**
															Combined HAPs	**2.35**	

NOTE: Primer KA91271HS and other paints (KA241HS, KA270HS and KA646HS are HAP free)

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Soldering Unit ID	Soldering Usage		Weight % VOC	% Lead	Maximum Throughput - Electronic bd Soldered (bd/hr)	Uncontrolled PTE Emissions (tons/yr)		Process weight Rate (ton/hr)
KISS Soldering Unit						Lead/PM/PM10/PM2.5	VOC	
R562 Sn63Pb37 Solder	0.304	oz/bd	-	34%	10	0.29		0.00000
Flux 2331 zx	0.0007	lb/bd	35%	-	10	-	0.011	
Alcohol	0.000182	lb/bd	100%		10		0.008	
Wave Soldering Unit								
R562 Sn63Pb37 Solder	0.32	oz/bd	-	34%	20	0.62		
Flux 2331 zx	0.44	lb/bd	35%		20		13.490	
Alcohol	0.1144	lb/bd	100%		20		10.021	
Placer Soldering Unit								
Solder Paste	0.032	oz/bd	-	34%	20	0.18		
Total PTE						1.10	23.53	

Methodology:
Soldering Lead/PM/PM10/PM2.5, tons/yr = usage oz/bd x throughput, bd/hr x 0.065 lb/oz x 8760hrs/yr x ton/2000 lbs x % lead
Soldering VOC, tons/yr = usage, lb/bd x wt % VOC x throughput, bd/hr x 8760 hrs/yr x ton/2000 lbs

Sanding PTE

For the head and footboards (One unit is approx. 3'X2' and 3" thick): They will sand a max of 2 units/hr with approx. 0.5 grams (weight)/hr of refuse
For bed sanding to ready for painting: They will sand approx. 4 beds/hr with approx. 0.375 lbs/hr of refuse

Parts Sanded	**Weight of Refuse**	**Uncontrolled PM/PM10/PM2.5 (tons/yr)**	**Controlled PM/PM10/PM2.5 (tons/yr)**
Electric Sander -Head and Footboards	0.5 grams/hr	0.005	0.000025
Hand Sanding - Bed	0.375 lb/hr	1.64	0.0082
Total Uncontrolled PTE		1.65	0.01

Sanding operation is controlled by a cartridge filter = 99.5 % control efficiency.

Company Name: **Bed Techs Inc.**
Address City IN Zip: **551 Minger Drive, Greendale, IN 47025**
MSOP No.: **029-32596**
Plant ID: **029-00044**
Reviewer: **Aida DeGuzman**
Date: **Dec. 12, 2012**

Material	Gal of Mat. (gal/unit)	Maximum (unit/hour)	VOC Content of Coating (lbs VOC/gal of coating less water as applied)	Σ(C*U)	Coating Usage Rate (Σ U)	Volume Weighted Average (A)	
Paint Booths (PB1, PB2)							
Primer KA91271HS	0.017	4.00	3.41	5.57	1.63		
Paint KA270HS	0.540	4.00	3.5	180.92	51.84		
Touch Up Paint (KA646HS	0.017	4.00	3.43	5.60	1.63		
				192.08	**55.10**	**3.49**	< 3.5 lb/gal less water limit

Note: Only paint and solvents added to coatings are used to demonstrate compliance with 326 IAC 8-2-9.

Methodology
Volume Weighted Average Equation:

$$A = \left[\sum_{i=1}^{n} (C_i)(U_i) / \sum_{i=1}^{n} U_i \right]$$

A = the volume weighted average in pounds VOC per gallon less water as applied;
C = the VOC content of the coating ($_i$) in pounds VOC per gallon less water as applied; and
U = the usage rate of the coating ($_i$) in gallons per month.

326 IAC 8-2-9 (Miscellaneous Metal Coating)
The source is subject to 326 IAC 8-2-9, because its construction commences after July 1, 1990, and have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the spray booths, PB1 and PB2 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: **Bed Techs inc.**
Address City IN Zip: **551 Minger Drive, Greendale, IN 47025**
MSOP No.: **029-32596**
Plt ID: **029-00044**
Reviewer: **Aida DeGuzman**
Date: **Dec. 6, 2012**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(carbon steel)	2	0.02		0.0055	0.0005			0.000	0.000	0.000	0	0.000
	Number of Stations	Max. Metal Thickness	Max. Metal Cutting Rate	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
Potential Emissions lbs/hr								0.00				0.00
Potential Emissions lbs/day								0.01				0.00
Potential Emissions tons/year								0.00				0.00

Welding operation ia controlled by catridge filters with control effciency of 99.5%

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculting the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

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

Company Name: **Bed Techs Inc.**
Address City IN Zip: **551 Minger Drive, Greendale, IN 47025**
MSOP No.: **029-32596**
Plt ID: **029-00044**
Reviewer: **Aida DeGuzman**
Date: **Dec. 6, 2012**

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr
1.5	RTU 1 - RTU 6	12.9
0.5	F1 - F7	4.3
1.2	UH 1 - UH3	10.3
4.3	Paint Return	36.8
7.5		64.3

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.1	0.24	0.24	0.0	3.2	0.2	2.7

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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

Company Name: Bed Techs Inc.
Address City IN Zip: 551 Minger Drive, Greendale, IN 47025
MSOP No.: 029-32596
Plt ID: 029-00044
Reviewer: Aida DeGuzman
Date: Dec. 6, 2012

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.353E-05	7.729E-06	4.831E-04	1.159E-02	2.190E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.221E-06	7.085E-06	9.018E-06	2.448E-06	1.353E-05

Worst Single HAP	1.159E-02
Combined HAPs	1.213E-02

Methodology is the same as page 6.

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

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

Company Name: **Bed Techs Inc.**
Address City IN Zip: **551 Minger Drive, Greendale, IN 47025**
MSOP No.: **029-32596**
Plt ID: **029-00044**
Reviewer: **Aida DeGuzman**
Date: **Dec. 6, 2012**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	773	0.0	0.0
Summed Potential Emissions in tons/yr	773		
CO2e Total in tons/yr	778		

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.
Global 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).

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: Andrew Jandes
Bed Techs, Inc.
PO Box 300
Aurora, IN 47001

DATE: February 28, 2013

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

SUBJECT: Final Decision
New Source Construction & MSOP
029-32596-00044

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:
Michael Wilson – President/CEO
Robin Feller – JRM 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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Indianapolis, Indiana 46204
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Toll Free (800) 451-6027
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February 28, 2013

TO: Lawrenceburg Public Library

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

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

Applicant Name: **Bed Techs, Inc.**
Permit Number: **029-32596-00044**

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 2/28/2013 Bed Techs Inc 029-32596-00044 Final		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	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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		Andrew Jandes Bed Techs Inc PO Box 300 Aurora IN 47001 (Source CAATS) via confirmed delivery									
2		Michael Wilson President/CEO Bed Techs Inc 893 S SR 129 Milan IN 47031 *(RO CAATS)*									
3		Michael & Monica Ramsey 9931 Old SR 56 Aurora IN 47001 *(Affected Party)*									
4		Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 *(Local Official)*									
5		Dearborn County Health Department 215-b W. Hight St, County Admin Building Lawrenceburg IN 47025-1910 *(Health Department)*									
6		Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 *(Affected Party)*									
7		Robin & Vic Willoughby 311 Broadway Street Aurora IN 47001 *(Affected Party)*									
8		James & Mary Hassett 7199 E. Laughery Creek Rd Aurora IN 47001 *(Affected Party)*									
9		Nancy & William McDaniel 4600 Hartford PK # 98 Aurora IN 47001 *(Affected Party)*									
10		Ken & Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 *(Affected Party)*									
11		Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 *(Affected Party)*									
12		Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 *(Affected Party)*									
13		Ms. Patricia Huff 10095 Old SR 56 Aurora IN 47001 (Affected Party)									
14		Sam & Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 *(Affected Party)*									
15		Peter & Jody Franklin 9212 Hawksridge Dr. Covington KY 41017-9136 *(Affected Party)*									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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IDEM Staff	GHOTOPP 2/28/2013 Bed Techs Inc 029-32596-00044 Final		
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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1		Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)									
2		Robin Feller JRM Environmental, Inc. PO Box 926 Brownsburg IN 46112 *(Consultant)*									
3		Lawrenceburg Public Library 150 Mary Street Lawrenceburg IN 47025 *(Library)*									
4		City of Greendale 510 Ridge Avenue Greendale IN 47025 *(Affected Party)*									
5		Michael & Bonnie Speidel 530 Ridge Avenue Greendale IN 47025 *(Affected Party)*									
6		William & Patricia Krider 548 Ridge Avenue Greendale IN 47025 *(Affected Party)*									
7		Linda S Milan 572 Ridge Avenue Greendale IN 47025 *(Affected Party)*									
8		Roger & Jean Woodfill 18114 Pribble Road Greendale IN 47025 *(Affected Party)*									
9		Indiana Gaming Company, LP 777 Argosy Parkway Greendale IN 47025 *(Affected Party)*									
10		R.J.T. Associates 1722 H. South Memorial New Castle IN 47236 *(Affected Party)*									
11		Dearborn County Emergency Management Agency 401 West High Street Lawrenceburg IN 47025 *(Affected Party)*									
12		Greendale Utilities 510 Ridge Avenue Greendale IN 47025 *(Affected Party)*									
13		South Dearborn Regional Sewer District 370 W. Eads Parkway Lawrenceburg IN 47025 (Affected Party)									
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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