



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: July 22, 2013

RE: Comlux Aviation / 097 - 33301 - 00702

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Wally Turner
Comlux Aviation
2910 S. High School Road
Indianapolis, IN 46241

July 22, 2013

Re: 097-33301-00702
First Minor Revision to
F097-32140-00702

Dear Wally:

Comlux Aviation was issued a Federally Enforceable State Operating Permit (FESOP) No. F097-32140-00702 on October 16, 2012 for a stationary aircraft part surface coating operation located at 2910 S. High School Road, Indianapolis 46241. On June 11, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to the addition of a new paint booth and air wall and the addition of insignificant activities that were not previously included in the permit. The attached Technical Support Document (TSD) provides additional explanation of the changes to the permit.

Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-8-11.1(e). Pursuant to the provisions of 326 IAC 2-8-11.1, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Heath Hartley of my staff at 317-232-8217 or 1-800-451-6027, and ask for extension 2-8217.

Sincerely,



Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

NB/hh

cc: File - Marion County
Marion County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

**Comlux Aviation
2910 South High School Road
Indianapolis, Indiana 46241**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F097-32140-00702	
Issued by: Original Signed by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 16, 2012 Expiration Date: October 16, 2017

Minor Permit Revision No.: 097-33301-00702	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 22, 2013 Expiration Date: October 16, 2017



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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary aircraft part surface coating operation.

Source Address:	2910 South High School Road, Indianapolis, Indiana 46241
General Source Phone Number:	(317) 472-7370
SIC Code:	4581 (Airports, Flying Fields, and Airport Terminal Services)
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

This stationary source also includes the following insignificant activities:

- (a) Two (2) HVLP paint spray booths, identified as 1 and 2, with a maximum capacity of two (2) cabinets per hour, each, constructed in 2012, utilizing dry filters for particulate control exhausting to stacks 1 and 2, respectively.
- (b) Two (2) glue air walls, identified as 3 and 4, with a maximum capacity of one (1) sheet of 4.8 veneer per hour, each, constructed in 2012, utilizing dry filters for particulate control, exhausting to stacks 3 and 4, respectively.
- (c) One (1) HVLP Paint Booth, identified as Paint Booth 3, approved for construction in 2013, with a maximum capacity of 2 cabinets per hour, using dry filters as control, and exhausting to stack S-18.
- (d) One (1) Air Wall, identified as Glue Air Wall 5, approved for construction in 2013, with a maximum capacity of one (1) unit per hour using HVLP spray, using dry filters as control, and exhausting to stack S-17.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) Woodworking operations, controlled by a dust collector with a cyclone/dust bin for collection. [326 IAC 6-3-2]
- (b) Degreasing operations with capacity of 6.7 gallons per month and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment and grinding operations.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (1) Roof Top Unit 1, with maximum heat input capacity of 0.98 MMBtu/hr.
 - (2) Roof Top Unit 2, with maximum heat input capacity of 0.22 MMBtu/hr.
 - (3) Roof Top Unit 3, with maximum heat input capacity of 0.31 MMBtu/hr.
 - (4) Roof Top Unit 4, with maximum heat input capacity of 0.22 MMBtu/hr.
 - (5) Roof Top Unit 5, with maximum heat input capacity of 0.24 MMBtu/hr.
 - (6) Roof Top Unit 6, with maximum heat input capacity of 0.12 MMBtu/hr.
 - (7) Roof Top Unit 7, with maximum heat input capacity of 0.07 MMBtu/hr.
 - (8) Roof Top Unit 8, with maximum heat input capacity of 0.07 MMBtu/hr.
 - (9) Roof Top Unit 9, with maximum heat input capacity of 0.24 MMBtu/hr.
 - (10) Roof Top Unit 10, with maximum heat input capacity of 0.07 MMBtu/hr.
- (e) Cleaners and solvents characterized as having a vapor pressure equal to or less than: two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or (bb) seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.
- (f) One Dip tank used at the metal etching operation, constructed in 2012.
- (g) Two (2) enclosed spray gun cleaners used to clean spray paint guns.
- (h) Miscellaneous Exterior Spray Painting used to perform touchup spray painting.
- (i) One Touchup Booth, with a maximum capacity of 0.01 gallon per hour.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when 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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F097-32140-00702, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality,
Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F097-32140-00702 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
- (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.
- Records of required monitoring information include the following, where applicable:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.
- These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) HVLP paint spray booths, identified as 1 and 2, with a maximum capacity of two (2) cabinets per hour, each, constructed in 2012, utilizing dry filters for particulate control exhausting to stacks 1 and 2, respectively.
- (b) Two (2) glue air walls, identified as 3 and 4, with a maximum capacity of one (1) sheet of 4.8 veneer per hour, each, constructed in 2012, utilizing dry filters for particulate control, exhausting to stacks 3 and 4, respectively.
- (c) One (1) HVLP Paint Booth, identified as Paint Booth 3, approved for construction in 2013, with a maximum capacity of 2 cabinets per hour, using dry filters as control, and exhausting to stack S-18.
- (d) One (1) Air Wall, identified as Glue Air Wall 5, approved for construction in 2013, with a maximum capacity of one (1) unit per hour using HVLP spray, using dry filters as control, and exhausting to stack S-17.

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

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

D.1.1 Hazardous Air Pollutant Limitations [326 IAC 2-8] [326 IAC 2-4.1]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable, the Permittee shall comply with the following:

- (a) The total input of each single HAP to Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4, and 5, shall be less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and
- (b) The total input of combined HAPs to Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4, and 5 shall be less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of each single HAP to less than ten (10) tons per 12 consecutive month period and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Particulate from Paint Booths 1, 2 and 3 shall each be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-10]

Pursuant to 326 IAC 8-2-10(d), the Permittee shall comply with the following for Paint Booths 1, 2 and 3 when coating flat wood panels:

- (a) VOC emissions from Paint Booths 1, 2 and 3 shall each not exceed 6.0 pounds of VOC per 1,000 square feet of coated finished product from printed interior panels, regardless of the number of coats applied.
- (b) VOC emissions from Paint Booths 1, 2 and 3 shall each not exceed 12.0 pounds of VOC per 1,000 square feet of coated finished product from natural finish hardwood plywood panels, regardless of the number of coats applied.
- (c) VOC emissions from Paint Booths 1, 2 and 3 shall each not exceed 10.0 pounds of VOC per 1,000 square feet of coated finished product from Class II finishes on hardboard panels, regardless of the number of coats applied.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating of wood furnishings and/or simulated wood furnishings, including cabinets, tables, beds chairs, sofas (non-upholstered), art objects, and other coated furnishings, within Paint Booths 1, 2 and 3 shall utilize one (1) or more of the following application systems:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Compliance Determination Requirements

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

Compliance with the VOC and HAP limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters associated with Paint Booths 1, 2 and 3. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks associated with Paint Booths 1, 2 and 3 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP limitations established in Conditions D.1.1 and D.1.3.
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on 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.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC, worst case single HAP, and total combined HAP input for each month.
 - (5) The total VOC, worst case single HAP, and total combined HAP input for each compliance period.
 - (6) When coating printed interior panels in Paint Booths 1, 2, and/or 3, the Permittee shall maintain records of the square feet of coated interior panels per booth and the VOC emissions per booth in units of pounds of VOC per 1,000 square feet of coated finished product.
 - (7) When coating natural finish hardwood plywood panels in Paint Booths 1, 2, and/or 3, the Permittee shall maintain records of the square feet of coated natural finish hardwood plywood panels per booth and the VOC emissions per booth in units of pounds of VOC per 1,000 square feet of coated finished product.
 - (8) When applying Class II finishes on hardboard panels in Paint Booths 1, 2, and/or 3, the Permittee shall maintain records of the square feet of coated hardboard panels per booth and the VOC emissions per booth in units of pounds of VOC per 1,000 square feet of coated finished product.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1(a) and D.1.1(b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (a) Woodworking operations, controlled by a dust collector with a cyclone/dust bin for collection. [326 IAC 6-3-2]
- (b) Degreasing operations with capacity of 6.7 gallons per month and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]

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

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operation shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. The pound per hour limitation was calculated with the following equation:

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

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

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall ensure the following control equipment and operating requirements are met for each of the degreasing operations:

- (a) Ensure the following control equipment and operating requirements are met:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in covered containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:

- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Compliance Determination Requirements

D.2.4 Particulate Control

In order to comply with Condition D.2.1, the dust collector with a cyclone/dust bin for particulate control shall be in operation and control emissions from each of the woodworking operation at all times that the corresponding woodworking operation is in operation.

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

D.2.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.3, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent purchased.

- (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit 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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241
FESOP Permit No.: F097-32140-00702

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241
FESOP Permit No.: F097-32140-00702

This form consists of 2 pages

Page 1 of 2

- | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241
FESOP Permit No.: F097-32140-00702
Facility: Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5
Parameter: Worst Case Single HAP Input
Limit: The total input of each single HAP to Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5 shall be less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241
FESOP Permit No.: F097-32140-00702
Facility: Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5
Parameter: Total Combined HAPs Input
Limit: The total input of combined HAPs to Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5 shall be less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Comlux Aviation
 Source Address: 2910 South High School Road, Indianapolis, Indiana 46241
 FESOP Permit No.: F097-32140-00702

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Comlux Aviation
2910 South High School Road
Indianapolis, Indiana 46241

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 Comlux Aviation 2910 South High School Road, Indianapolis, Indiana 46241, completed construction of the aircraft part surface coating operation on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on July 23, 2012 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F097-32140-00702, Plant ID No. 097-00702 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**

Technical Support Document (TSD) for a Minor Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Comlux Aviation
Source Location:	2910 S. High School Road, Indianapolis, IN 46241
County:	Marion
SIC Code:	4581 (Airports, Flying Fields, and Airport Terminal Services)
Operation Permit No.:	F097-32140-00702
Operation Permit Issuance Date:	October 16, 2012
Minor Permit Revision No.:	097-33301-00702
Permit Reviewer:	Heath Hartley

On June 11, 2013, the Office of Air Quality (OAQ) received an application from Comlux Aviation related to a modification to an existing aircraft part surface coating operation.

Existing Approvals

The source was issued FESOP No. F097-32140-00702 on October 16, 2012.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .	

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (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. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD or Appendix A of F097-32140-00702 issued on October 16, 2012.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Paint Booth1	10.7	10.7	10.7	0	0	15.9	0	0	<24.0	<9.5 (Styrene)
Paint Booth 2	10.7	10.7	10.7	0	0	15.9	0	0		
Glue Air Wall 3	0.37	0.37	0.37	0	0	2.46	0	0		
Glue Air Wall 4	0.37	0.37	0.37	0	0	2.46	0	0		
Clean-Up Solvent	0	0	0	0	0	0.11	0	0	0.01	0.01 (Toluene)
Total PTE of Entire Source	22.2	22.2	22.2	0	0	36.8	0	0	<24.01	<9.5 (Styrene)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	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 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

- (a) **PSD Minor Source**
 This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit all attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and this source is

not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

- (b) **Emission Offset Minor Source**
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM_{2.5}), is less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Comlux Aviation on June 11, 2013, relating to the addition of a new paint booth and air wall and the addition of insignificant activities that were not previously included in the permit.

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

- (a) One (1) HVLP Paint Booth, identified as Paint Booth 3, approved for construction in 2013, with a maximum capacity of 2 cabinets per hour, using dry filters as control, and exhausting to stack S-18.
- (b) One (1) Air Wall, identified as Glue Air Wall 5, approved for construction in 2013, with a maximum capacity of one (1) unit per hour using HVLP spray, using dry filters as control, and exhausting to stack S-17.
- (c) One Touchup Booth, with a maximum capacity of 0.01 gallon per hour.

The following is a list of the insignificant activities that were not previously included in the permit:

- (a) Woodworking operations, controlled by a dust collector with a cyclone/dust bin for collection. [326 IAC 6-3-2]
- (b) Degreasing operations with capacity of 6.7 gallons per month and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment and grinding operations.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (1) Roof Top Unit 1, with maximum heat input capacity of 0.98 MMBtu/hr.
 - (2) Roof Top Unit 2, with maximum heat input capacity of 0.22 MMBtu/hr.
 - (3) Roof Top Unit 3, with maximum heat input capacity of 0.31 MMBtu/hr.
 - (4) Roof Top Unit 4, with maximum heat input capacity of 0.22 MMBtu/hr.
 - (5) Roof Top Unit 5, with maximum heat input capacity of 0.24 MMBtu/hr.
 - (6) Roof Top Unit 6, with maximum heat input capacity of 0.12 MMBtu/hr.
 - (7) Roof Top Unit 7, with maximum heat input capacity of 0.07 MMBtu/hr.
 - (8) Roof Top Unit 8, with maximum heat input capacity of 0.07 MMBtu/hr.
 - (9) Roof Top Unit 9, with maximum heat input capacity of 0.24 MMBtu/hr.
 - (10) Roof Top Unit 10, with maximum heat input capacity of 0.07 MMBtu/hr.

- (e) Cleaners and solvents characterized as having a vapor pressure equal to or less than: two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or (bb) seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.
- (f) One Dip tank used at the metal etching operation, constructed in 2012.
- (g) Two (2) enclosed spray gun cleaners used to clean spray paint guns.
- (h) Miscellaneous Exterior Spray Painting used to perform touchup spray painting.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Paint Booth 3	10.7	10.7	10.7	0	0	15.9	0	0	8.06	8.02 (Styrene)
Glue Air Wall 5	0.37	0.37	0.37	0	0	2.46	0	0	1.01	0.74 (Hexane)
Touchup Booth	0	0	0	0	0	0.25	0	0	0	0
Insignificant Activities***	6.59	6.65	6.65	0.01	1.11	1.88	0.93	1343	0.01	0.02 (Hexane)
Total PTE of Proposed Revision	17.7	17.8	17.8	0.01	1.1	20.5	0.9	1343	9.08	8.02 (Styrene)

***Insignificant activities were not previously included in the permit.

Pursuant to 326 IAC 2-8-11.1(d)(3), this FESOP is being revised through a FESOP Minor Permit Revision because the proposed revision involves the construction of new emission units with potential to emit (PTE) within the following ranges:

- (A) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either PM, PM₁₀, or direct PM_{2.5}.
- (B) Less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of sulfur dioxide (SO₂).
- (C) Less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of nitrogen oxides (NO_x).
- (D) Less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of VOC for modifications that are not described in clause (E).

- (E) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of VOC for modifications that require the use of air pollution control equipment to comply with the applicable provisions of 326 IAC 8.
- (F) Less than one hundred (100) tons per year and equal to or greater than twenty-five (25) tons per year of carbon monoxide (CO).
- (G) Less than five (5) tons per year and equal to or greater than two-tenths (0.2) ton per year of lead (Pb).
- (H) Less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of the following regulated air pollutants:
 - (i) Hydrogen sulfide (H₂S).
 - (ii) Total reduced sulfur (TRS).
 - (iii) Reduced sulfur compounds.
 - (iv) Fluorides.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Paint Booth 1	10.7	10.7	10.7	0	0	15.9	0	0	< 24.0	< 9.5 (Styrene)
Paint Booth 2	10.7	10.7	10.7	0	0	15.9	0	0		
Paint Booth 3	10.7	10.7	10.7	0	0	15.9	0	0		
Glue Air Wall 3	0.37	0.37	0.37	0	0	2.46	0	0		
Glue Air Wall 4	0.37	0.37	0.37	0	0	2.46	0	0		
Glue Air Wall 5	0.37	0.37	0.37	0	0	2.46	0	0		
Clean-Up Solvent****	0	0	0	0	0	0.11	0	0	0.01	0.01
Insignificant Activities***	6.59	6.65	6.65	0.01	1.11	2.24	0.93	1343	0.02	0.02 (Hexane)
Total PTE of Entire Source	22.22 39.9	22.22 40.0	22.22 40.0	0 0.01	0 1.1	36.78 57.2	0.00 0.93	01343	<24.01 < 25	<9.54 < 10
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	NA	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	100	NA	NA	NA	NA	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 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.
 ***Some insignificant activities were not previously included in the permit.
 ****Clean-Up Solvents are now included with Insignificant Activities

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Paint Booth1	10.7	10.7	10.7	0	0	15.9	0	0	< 24.0 ⁽¹⁾	< 9.5 ⁽¹⁾ (Styrene)
Paint Booth 2	10.7	10.7	10.7	0	0	15.9	0	0		
Paint Booth 3	10.7	10.7	10.7	0	0	15.9	0	0		
Glue Air Wall 3	0.37	0.37	0.37	0	0	2.46	0	0		
Glue Air Wall 4	0.37	0.37	0.37	0	0	2.46	0	0		
Glue Air Wall 5	0.37	0.37	0.37	0	0	2.46	0	0		
Insignificant Activities	6.59	6.65	6.65	0	1.11	2.24	0.93	1343	0.02	0.02 (Hexane)
Total PTE of Entire Source	39.9	40.0	40.0	0	1.1	57.2	0.93	1343	< 25	< 10
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	NA	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	100	NA	NA	NA	NA	NA	NA

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.
 (1) Limited such that 326 IAC 2-4.1 and 326 IAC 2-7 do not apply.

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

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

- (1) The total input of each single HAP to the spray booths, identified as Paint Booths 1, 2 and 3, and the glue air walls, identified as Glue Air Walls 3, 4, and 5, shall be less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and
- (2) The total input of combined HAPs to the spray booths, identified as Paint Booths 1, 2 and 3, and the glue air walls, identified as Glue Air Walls 3, 4, and 5, shall be less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of each single HAP to less than ten (10) tons per 12 consecutive month period and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will

continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) Emission Offset Minor Source

This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included for this proposed revision, since this source does not coat metal furniture.
- (b) The requirements of the New Source Performance Standards for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included for this proposed revision, since this source does not coat large appliances as defined in 40 CFR 60.451(a).
- (c) The requirements of the New Source Performance Standards for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (326 IAC 12), are not included for this proposed revision, since this source does not perform polymeric coating of supporting substrates, as defined in 40 CFR 60.741(a).
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included for this proposed revision, since this source does not use halogenated solvents.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), are not included for this proposed revision, since, while items coated at this source could be considered wood furniture components, this source is not a major source of HAP as defined in 40 CFR Part 63, Subpart A (40 CFR 63.2). This source will limit HAP emissions to below major source levels.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD, are not included for this proposed revision, since this source does not manufacture plywood or composite wood products.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85), are not included for this proposed revision, since this source does not coat automobiles or light-duty trucks.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included for this proposed revision, since this source is not a major source of HAPs. This source will limit HAP emissions to below major source levels.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81),

- are not included for this proposed revision, since this source is not a major source of HAPs. This source will limit HAP emissions to below major source levels.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included for this proposed revision, since the items coated at this source are not used in the construction of residential, commercial, or institutional buildings.
 - (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included for this proposed revision, since this source does not coat metal furniture.
 - (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included for this proposed revision, since this source does not conduct paint stripping operations involving the use of chemical strippers that contain methylene chloride, conduct autobody refinishing operations, or conduct spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) to any part or product made of metal or plastic.
 - (n) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-3 (Emission Offset)
This modification to an existing minor stationary source under 326 IAC 2-3 (Emission Offset) will not change the minor status, because the potential to emit of PM_{2.5} from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3 (Emission Offset) requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

- (e) 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.
- (f) 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.
- (g) 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.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to 326 IAC 6-5, because the source does not have a potential fugitive particulate matter emission of twenty-five (25) tons per year or more.
- (i) 326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
- (j) 326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.5 because it is not located in Lake County.
- (k) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Surface Coating Operations

- (m) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 - (1) Pursuant to 326 IAC 6-3-1(b)(15), Paint Booth 3 is subject to the requirements of 326 IAC 6-3, since it has the potential to use equal to or greater than five (5) gallons per day of surface coatings. Pursuant to 326 IAC 6-3-2, particulate from Paint Booth 3 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
 - (2) Pursuant to 326 IAC 6-3-1(b)(15), Glue Air Wall 5 is not subject to the requirements of 326 IAC 6-3, since each unit has the potential to use less than five (5) gallons per day of surface coatings.
- (n) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 - (1) Paint Booth 3 is not subject to the requirements of 326 IAC 8-1-6, since it is subject to the requirements of 326 IAC 8-2-10 and 326 IAC 8-2-12.

- (2) The unlimited VOC potential emissions from Glue Air Wall 5 is less than than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (o) 326 IAC 8-2-6 (Metal Furniture Coating Operations)
Paint Booth 3 and Glue Air Wall 5 apply coatings to various aircraft parts, comprised primarily of veneer, including overhead bins, cabinets, drawers, and small dressers. These items are not metal furniture. Therefore, the requirements of 326 IAC 8-2-6 do not apply.
- (p) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
Paint Booth 3 and Glue Air Wall 5 are not subject to the conditions of 326 IAC 8-2-9, because the source does not perform plastic parts coating in Lake or Porter County and the source does not perform metal surface coating of the types of items listed in 326 IAC 8-2-9(a)(1). This source applies coatings to various aircraft parts, comprised primarily of veneer, including overhead bins, cabinets, drawers, and small dressers under SIC Code 4581.

- (q) 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)
 - (1) Paint Booth 3 is subject to the requirements of 326 IAC 8-2-10 when coating flatwood panels, including printed interior panels, natural finish hardwood plywood panels and/or hardboard panels, as defined in 326 IAC 8-2-10(a), because this spray booth was constructed after July 1, 1990, and has potential VOC emissions of greater than 15 pounds per day before add-on controls.

Pursuant to 326 IAC 8-2-10(d), the Permittee shall comply with the following for Paint Booth 3 when coating flatwood panels:

- (A) VOC emissions from Paint Booth 3 shall not exceed 6.0 pounds of VOC per 1,000 square feet of coated finished product from printed interior panels, regardless of the number of coats applied.
- (B) VOC emissions from Paint Booth 3 shall not exceed 12.0 pounds of VOC per 1,000 square feet of coated finished product from natural finish hardwood plywood panels, regardless of the number of coats applied.
- (C) VOC emissions from Paint Booth 3 shall not exceed 10.0 pounds of VOC per 1,000 square feet of coated finished product from Class II finishes on hardboard panels, regardless of the number of coats applied.
- (2) Glue Air Wall 5 (constructed after July 1, 1990) is not subject to the requirements of 326 IAC 8-2-10 because it has potential VOC emissions of less than 15 pounds per day before add-on controls.
- (r) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
 - (1) Paint Booth 3 is subject to the requirements of 326 IAC 8-2-12 when coating wood furnishings and/or simulated wood furnishings, including cabinets, tables, beds chairs, sofas (non-upholstered), art objects, and other coated furnishings, because the spray booth was constructed after July 1, 1990, and has potential VOC emissions of greater than 15 pounds per day before add-on controls.

Pursuant to 326 IAC 8-2-12, the surface coating of wood furnishings and/or simulated wood furnishings, including cabinets, tables, beds chairs, sofas (non-upholstered), art objects, and other coated furnishings, within Paint Booth 3 shall utilize one (1) or more of the following application systems:

Airless Spray Application System
Air-Assisted Airless Spray Application System
Electrostatic Spray Application System
Electrostatic Bell or Disc Application System

Heated Airless Spray Application System
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Paint Booth 3 utilizes HVLP spray application. Therefore, this spray booth can comply with this rule.

- (2) Glue air wall 5 is not subject to the requirements of 326 IAC 8-2-12 because it has potential VOC emissions of less than 15 pounds per day before add-on controls.
- (s) There are no other 326 IAC 8 Rules that are applicable to Paint Booth 3 and Glue Air Wall 5.

Insignificant Activities

- (t) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 - (1) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. The pound per hour limitation was calculated with the following equation:

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

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

The hourly potential particulate matter emissions before control for each of the woodworking operation is greater than the 326 IAC 6-3-2 allowable particulate emission rate. Therefore, the dust collector with a cyclone/dust bin shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.
 - (2) Pursuant to 326 IAC 6-3-1(b)(9), since the welding operation uses less than 625 pounds of wire per day it is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).
- (u) 326 IAC 8-3-2 and 326 IAC 8-3-8 (Cold Cleaner Operation)
The cold cleaner degreasing operations that do not have remote solvent reservoirs were installed after January 1, 1990. Therefore, pursuant to 326 IAC 8-3-1(c)(2)(A), they are subject to 326 IAC 8-3-2. On January 1, 2015, the cold cleaner degreaser will be subject to 326 IAC 8-3-8, pursuant to 326 IAC 8-3-8(c)(3)(B).

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall ensure the following control equipment and operating requirements are met for each of the degreasing operations:

- (a) Ensure the following control equipment and operating requirements are met:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.

- (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in covered containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.
- Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (v) No other state rules apply to the other insignificant activities included in this permit.

Compliance Determination, Monitoring and Testing Requirements

The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Dry Filters associated with Spray Booth 3	Inspections to verify the placement, integrity, and particle loading of filters	Once per day
	Observations of the overspray when one or more of the booths are in operation	Once per week
	Inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground	Once per month

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

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

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

- (c) **One (1) HVLP Paint Booth, identified as Paint Booth 3, approved for construction in 2013, with a maximum capacity of 2 cabinets per hour, using dry filters as control, and exhausting to stack S-18.**
- (d) **One (1) Air Wall, identified as Glue Air Wall 5, approved for construction in 2013, with a maximum capacity of one (1) unit per hour using HVLP spray, using dry filters as control, and exhausting to stack S-17.**

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

 This stationary source ~~does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21)~~ **also includes the following insignificant activities:**

- (a) **Woodworking operations, controlled by a dust collector with a cyclone/dust bin for collection. [326 IAC 6-3-2]**
- (b) **Degreasing operations with capacity of 6.7 gallons per month and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]**
- (c) **The following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment and grinding operations.**
- (d) **Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.**
 - (1) **Roof Top Unit 1, with maximum heat input capacity of 0.98 MMBtu/hr.**
 - (2) **Roof Top Unit 2, with maximum heat input capacity of 0.22 MMBtu/hr.**
 - (3) **Roof Top Unit 3, with maximum heat input capacity of 0.31 MMBtu/hr.**
 - (4) **Roof Top Unit 4, with maximum heat input capacity of 0.22 MMBtu/hr.**
 - (5) **Roof Top Unit 5, with maximum heat input capacity of 0.24 MMBtu/hr.**
 - (6) **Roof Top Unit 6, with maximum heat input capacity of 0.12 MMBtu/hr.**
 - (7) **Roof Top Unit 7, with maximum heat input capacity of 0.07 MMBtu/hr.**

- (8) **Roof Top Unit 8, with maximum heat input capacity of 0.07 MMBtu/hr.**
- (9) **Roof Top Unit 9, with maximum heat input capacity of 0.24 MMBtu/hr.**
- (10) **Roof Top Unit 10, with maximum heat input capacity of 0.07 MMBtu/hr.**

- (e) **Cleaners and solvents characterized as having a vapor pressure equal to or less than: two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or (bb) seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.**

- (f) **One Dip tank used at the metal etching operation, constructed in 2012.**

- (g) **Two (2) enclosed spray gun cleaners used to clean spray paint guns.**

- (h) **Miscellaneous Exterior Spray Painting used to perform touchup spray painting.**

- (i) **One Touchup Booth, with a maximum capacity of 0.01 gallon per hour.**

.....

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) HVLP paint spray booths, identified as 1 and 2, with a maximum capacity of two (2) cabinets per hour, each, constructed in 2012, utilizing dry filters for particulate control exhausting to stacks 1 and 2, respectively.

- (b) Two (2) glue air walls, identified as 3 and 4, with a maximum capacity of one (1) sheet of 4.8 veneer per hour, each, constructed in 2012, utilizing dry filters for particulate control, exhausting to stacks 3 and 4, respectively.

- (c) **One (1) HVLP Paint Booth, identified as Paint Booth 3, approved for construction in 2013, with a maximum capacity of 2 cabinets per hour, using dry filters as control, and exhausting to stack S-18.**

- (d) **One (1) Air Wall, identified as Glue Air Wall 5, approved for construction in 2013, with a maximum capacity of one (1) unit per hour using HVLP spray, using dry filters as control, and exhausting to stack S-17.**

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

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

D.1.1 Hazardous Air Pollutant Limitations [326 IAC 2-8] [326 IAC 2-4.1]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable, the Permittee shall comply with the following:

- (a) The total input of each single HAP to the ~~two (2) HVLP paint spray booths, identified as 1 and 2~~ **Paint Booths 1, 2 and 3**, and the ~~two (2) glue air walls, identified as 3 and 4~~ **Glue**

Air Walls 3, 4, and 5 shall be less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

- (b) The total input of combined HAPs to ~~the two (2) HVLP paint spray booths, identified as 1 and 2~~ **Paint Booths 1, 2 and 3**, and ~~the two (2) glue air walls, identified as 3 and 4~~ **Glue Air Walls 3, 4, and 5** shall be less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of each single HAP to less than ten (10) tons per 12 consecutive month period and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Particulate from ~~the two (2) HVLP paint spray booths, identified as 1 and 2~~ **Paint Booths 1, 2 and 3** shall **each** be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-10]

Pursuant to 326 IAC 8-2-10(d), the Permittee shall comply with the following for ~~the two (2) HVLP paint spray booths, identified as 1 and 2~~ **Paint Booths 1, 2 and 3**, when coating flat wood panels:

- (a) VOC emissions from ~~the two (2) HVLP paint spray booths, identified as 1 and 2~~ **Paint Booths 1, 2 and 3** shall **each** not exceed 6.0 pounds of VOC per 1,000 square feet of coated finished product from printed interior panels, regardless of the number of coats applied.
- (b) VOC emissions from ~~the two (2) HVLP paint spray booths, identified as 1 and 2~~ **Paint Booths 1, 2 and 3** shall **each** not exceed 12.0 pounds of VOC per 1,000 square feet of coated finished product from natural finish hardwood plywood panels, regardless of the number of coats applied.
- (c) VOC emissions from ~~the two (2) HVLP paint spray booths, identified as 1 and 2~~ **Paint Booths 1, 2 and 3** shall **each** not exceed 10.0 pounds of VOC per 1,000 square feet of coated finished product from Class II finishes on hardboard panels, regardless of the number of coats applied.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating of wood furnishings and/or simulated wood furnishings, including cabinets, tables, beds chairs, sofas (non-upholstered), art objects, and other coated furnishings, within ~~the two (2) HVLP paint spray booths, identified as 1 and 2~~ **Paint Booths 1, 2 and 3** shall utilize one (1) or more of the following application systems:

.....

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

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters associated with ~~the two (2) HVLP paint spray booths, identified as 1 and 2~~ **Paint Booths 1, 2 and 3**. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required

by this condition. Failure to take response steps shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks associated with ~~the two (2) HVLP paint spray booths, identified as 1 and 2~~**Paint Booths 1, 2 and 3** and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

.....

D.1.8 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1(a) and D.1.1(b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (a) **Woodworking operations, controlled by a dust collector with a cyclone/dust bin for collection. [326 IAC 6-3-2]**
- (b) **Degreasing operations with capacity of 6.7 gallons per month and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]**

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

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operation shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. The pound per hour limitation was calculated with the following equation:

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

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

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall ensure the following control equipment and operating requirements are met for each of the degreasing operations:

- (a) **Ensure the following control equipment and operating requirements are met:**

- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in covered containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Compliance Determination Requirements

D.2.4 Particulate Control

In order to comply with Condition D.2.1, the dust collector with a cyclone/dust bin for particulate control shall be in operation and control emissions from each of the woodworking operation at all times that the corresponding woodworking operation is in operation.

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

D.2.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.3, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
- (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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

FESOP Quarterly Report

Source Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241
FESOP Permit No.: F097-32140-00702
Facility: ~~HVLP Paint Spray Booths 1 and 2 and Glue Air Walls 3 and 4~~ **Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5**
Parameter: Worst Case Single HAP Input
Limit: The total input of each single HAP to the two (2) HVLP paint spray booths, identified as 1 and 2, and the two (2) glue air walls, identified as 3 and 4, ~~4~~ **Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5** shall be less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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

FESOP Quarterly Report

Source Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241
FESOP Permit No.: F097-32140-00702
Facility: ~~HVLP Paint Spray Booths 1 and 2 and Glue Air Walls 3 and 4~~ **Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5**
Parameter: Total Combined HAPs Input
Limit: The total input of combined HAPs to ~~HVLP Paint Spray Booths 1 and 2 and Glue Air Walls 3 and 4~~ **Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5** shall be less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

.....

Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

1. IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. **The analog instrument shall be capable of measuring values outside of the normal range.**
- (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.

.....

2. IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlining rule.

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, **where applicable:**
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, **where applicable:**
 - (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.

.....

3. Record keeping requirements in Condition D.1.7 were revised in order to provide clarification for documenting compliance with the requirements of 326 IAC 8-2-10 contained in Condition D.1.7.

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC ~~content and input limits~~ and the HAP ~~content and input limitations~~ established in Conditions D.1.1 and D.1.3.

.....

- (6) **When coating printed interior panels in Paint Booths 1, 2, and/or 3, the Permittee shall maintain records of the square feet of coated interior panels per booth and the VOC emissions per booth in units of pounds of VOC per 1,000 square feet of coated finished product.**
- (7) **When coating natural finish hardwood plywood panels in Paint Booths 1, 2, and/or 3, the Permittee shall maintain records of the square feet of coated natural finish hardwood plywood panels per booth and the VOC emissions per booth in units of pounds of VOC per 1,000 square feet of coated finished product.**
- (8) **When applying Class II finishes on hardboard panels in Paint Booths 1, 2, and/or 3, the Permittee shall maintain records of the square feet of coated hardboard panels per booth and the VOC emissions per booth in units of pounds of VOC per 1,000 square feet of coated finished product.**

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 June 11, 2013.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Minor Permit Revision No. 097-33301-00702. The staff recommends to the Commissioner that this FESOP Minor Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Heath Hartley 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) 232-8217 or toll free at 1-800-451-6027 extension 8-8217.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Summary**

Company Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis IN 46241
Minor Permit Revision No.: 097-33301-00702
Reviewer: Heath Hartley
Date: 6/11/13

Uncontrolled/Unlimited Potential to Emit (tons/year)

	Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	GHG as CO ₂ e	Total HAPs	Highest Single HAP	
Existing	Paint Booth 1	10.7	10.7	10.7	0	0	15.9	0	0	8.06	8.02	Styrene
Existing	Paint Booth 2	10.7	10.7	10.7	0	0	15.9	0	0	8.06	8.02	Styrene
New	Paint Booth 3	10.7	10.7	10.7	0	0	15.9	0	0	8.06	8.02	Styrene
Existing	Glue Air Wall 3	0.37	0.37	0.37	0	0	2.46	0	0	1.01	0.74	Hexane
Existing	Glue Air Wall 4	0.37	0.37	0.37	0	0	2.46	0	0	1.01	0.74	Hexane
New	Glue Air Wall 5	0.37	0.37	0.37	0	0	2.46	0	0	1.01	0.74	Hexane
New	Insignificant Touchup Booth	0	0	0	0	0	0.25	0	0	0	0	NA
Existing	Insignificant Clean-Up Solvent	0	0	0	0	0	0.11	0	0	0.01	0.01	Toluene
Not previously included*	Insignificant Comb.	0.02	0.08	0.08	0	1.11	0.06	0.9	1343	0.00	0.02	Hexane
Not previously included*	Insignificant Activities	6.57	6.57	6.57	0	0	1.82	0	0	0.01	0.01	Toluene
	Total New	11.1	11.1	11.1	0.00	0.00	18.6	0.00	0	9.06	8.02	Styrene
	Total Not previously included*	6.59	6.65	6.65	0.01	1.11	1.88	0.93	1343	0.01	0.02	Hexane
	Total New and Not previously included	17.7	17.8	17.8	0.01	1.11	20.5	0.93	1343	9.08	8.02	Styrene
	Total Uncontrolled/Unlimited PTE After Modification	39.9	40.0	40.0	0.01	1.11	57.2	0.93	1343	27.2	24.0	Styrene

*Existing Insignificant Activities that were not previously included in the permit.

Limited Potential to Emit (PTE) After Issuance (tons/year)

	Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	GHG as CO ₂ e	Total HAPs	Highest Single HAP	
Existing	Paint Booth 1	10.7	10.7	10.7	0	0	15.9	0	0	< 24.0	< 9.5	Styrene
Existing	Paint Booth 2	10.7	10.7	10.7	0	0	15.9	0	0			
New	Paint Booth 3	10.7	10.7	10.7	0	0	15.9	0	0			
Existing	Glue Air Wall 3	0.37	0.37	0.37	0	0	2.46	0	0			
Existing	Glue Air Wall 4	0.37	0.37	0.37	0	0	2.46	0	0			
New	Glue Air Wall 5	0.37	0.37	0.37	0	0	2.46	0	0			
New	Insignificant Touchup Booth	0	0	0	0	0	0.25	0	0	0	0	NA
Existing	Insignificant Clean-Up Solvent	0	0	0	0	0	0.11	0	0	0.01	0.01	Toluene
Not previously included*	Insignificant Combustion	0.02	0.08	0.08	0	1.11	0.06	0.93	1343	0.00	0.02	Hexane
Not previously included*	Insignificant Activities	6.57	6.57	6.57	0	0	1.82	0	0	0.01	0.01	Toluene
	Total Limited PTE After Issuance	39.9	40.0	40.0	0	1.11	57.2	0.93	1343	< 25	< 10	Styrene

**Appendix A: Emissions Calculations
VOC and Particulate
From New Surface Coating Operations
Paint Booth 3 and Glue Air Wall 5**

Company Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis IN 46241
Minor Permit Revision No.: 097-33301-00702
Reviewer: Heath Hartley
Date: 6/11/13

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	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 Booth 3																			
Insulator "A"	7.36	68.00%	0.0%	68.0%	0.0%	32.00%	0.25	2.00	12.00	5.00	5.00	2.50	60.06	10.96	2.58	15.64	50%		
Insulator "B"	7.48	76.00%	0.0%	76.0%	0.0%	24.00%	0.25	2.00	12.00	5.68	5.68	2.84	68.22	12.45	1.97	23.69	50%		
Flex Polyester Topcoat	9.15	36.00%	0.0%	36.0%	0.0%	74.00%	0.25	2.00	12.00	3.29	3.29	1.65	39.53	7.21	6.41	4.45	50%		
Nauticoat XP	8.84	46.00%	0.0%	46.0%	0.0%	54.00%	0.25	2.00	12.00	3.97	3.97	1.99	47.69	8.70	5.11	7.36	50%		
530-2153	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	2.00	12.00	7.25	7.25	3.63	87.00	15.88	0.00	n/a	50%		
Polane T Polyurethane	8.51	73.00%	0.0%	73.0%	0.0%	27.00%	0.25	2.00	12.00	6.21	6.21	3.11	74.65	13.60	2.52	23.01	50%		
Polane T60 Polyurethane Enamel, Blending	15.32	36.00%	0.0%	36.0%	0.0%	64.00%	0.25	2.00	12.00	5.52	5.52	2.76	66.18	12.08	10.74	8.62	50%		
High Solids Polyurethane Clear	7.93	62.00%	0.0%	62.0%	0.0%	28.00%	0.25	2.00	12.00	4.92	4.92	2.46	59.00	10.77	3.30	17.56	50%		
Corrosion Protective Epoxy Primer, Green	10.85	26.00%	0.0%	26.0%	0.0%	74.00%	0.25	2.00	12.00	2.82	2.82	1.41	33.85	6.18	8.79	3.81	50%		
Worst Case Coating													3.63	87.00	15.88	10.74			
Glue Air Wall 5																			
3M Scotch-Weld Neoprene High Performance Contact Adhesive 1357	6.8	80.00%	14.0%	66.0%	14.0%	20.00%	0.125	1.00	3.00	5.22	4.49	0.56	13.46	2.46	0.37	22.44	50%		

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)
Note: VOC from catalysts is assumed not to volatilize. Therefore, catalyst materials are not included in these calculations.

**Appendix A: Emission Calculations
HAP Emission Calculations
From New Surface Coating Operations
Paint Booth 3 and Glue Air Wall 5**

Company Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis IN 46241
Minor Permit Revision No.: 097-33301-00702
Reviewer: Heath Hartley
Date: 6/11/13

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %						Potential to Emit (PTE) (tons/year)						
				MIBK	Toluene	Styrene	Xylene	Methyl Methacrylate	Hexane	MIBK	Toluene	Styrene	Xylene	Methyl Methacrylate	Hexane	Total HAP
Paint Booth 3																
Insulator "A"	7.36	0.25	2.00	25.00%	25.00%	0.00%	0.00%	0.00%	0.00%	4.03	4.03	0.00	0.00	0.00	0.00	8.06
Insulator "B"	7.48	0.25	2.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Flex Polyester Topcoat	9.15	0.25	2.00	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	0.00	0.00	8.02	0.00	0.00	0.00	8.02
Nauticoat XP 530-2153	8.64	0.25	2.00	1.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.19	0.00	0.00	1.89	0.00	0.00	2.08
Polane T Polyurethane Enamel, Carbide Black	7.25	0.25	2.00	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00	3.18	0.00	0.00	0.00	0.00	3.18
Polane T60 Polyurethane Enamel, Blending White	8.51	0.25	2.00	0.00%	8.00%	0.00%	4.00%	0.00%	0.00%	0.00	1.49	0.00	0.75	0.00	0.00	2.24
High Solids Polyurethane Clear	15.32	0.25	2.00	10.00%	0.00%	0.00%	1.00%	0.00%	0.00%	3.36	0.00	0.00	0.34	0.00	0.00	3.69
Corrosion Protective Epoxy Primer, Green	7.93	0.25	2.00	0.00%	0.00%	1.00%	40.00%	1.00%	0.00%	0.00	0.00	0.17	6.95	0.17	0.00	7.29
Worst Case Coating										4.03	4.03	8.02	6.95	0.17	0.00	8.06
Glue Air Wall 5																
3M Scotch-Weld Neoprene High Performance Contact Adhesive 1357	6.8	0.125	1.00	0.00%	7.00%	0.00%	0.00%	0.00%	20.00%	0.00	0.26	0.00	0.00	0.00	0.74	1.01

METHODOLOGY

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

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

Company Name: Comlux Aviation
 Source Address: 2910 South High School Road, Indianapolis IN 46241
 Minor Permit Revision No.: 097-33301-00702
 Reviewer: Heath Hartley
 Date: 6/11/13

Emission Source	Heat Input Capacity (MMBtu/Hr)	Potential Throughput (MMBtu/yr)
Roof Top Unit 1	0.98	8584.80
Roof Top Unit 2	0.22	1927.20
Roof Top Unit 3	0.31	2715.60
Roof Top Unit 4	0.22	1927.20
Roof Top Unit 5	0.24	2102.40
Roof Top Unit 6	0.12	1007.40
Roof Top Unit 7	0.07	613.20
Roof Top Unit 8	0.07	630.72
Roof Top Unit 9	0.24	2102.40
Roof Top Unit 10	0.07	630.72
Total	2.54	22241.64

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
2.54	1000	22.24

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.02	0.08	0.08	0.01	1.11	0.06	0.93

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

Methodology

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics				
	Benzene	Dichlorobenz	Formaldehyd	Hexane	Toluene
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03
Potential Emission in tons/yr	2.3E-05	1.3E-05	8.3E-04	2.0E-02	3.8E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	5.6E-06	1.2E-05	1.6E-05	4.2E-06	2.3E-05

Methodology is the same as previous page.
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Total	6.1E-05
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Greenhouse Gases

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	1,334	0.0	0.0
Summed Potential Emissions in tons/yr	1,335		
CO2e Total in tons/yr	1,343		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations
Insignificant Activities**

Company Name: Comlux Aviation
 Source Address: 2910 South High School Road, Indianapolis IN 46241
 Minor Permit Revision No.: 097-33301-00702
 Reviewer: Heath Hartley
 Date: 6/11/13

New Units:

Touch up Booth (TB)

Material	Usage (gal/hr)	VOC content (lb/gal)	Potential VOC (ton/yr)	HAP (ton/yr)
AxonHentzen ISB-910 Insulator B	0.01	5.68	0.25	Negl.

Methodology

Potential VOC (ton/yr) = Usage (gal/hr) * VOC content (lb/gal) * 8760 hr/yr * 1 ton/2000 lbs

Existing Units:

Clean-Up Solvents (CS)

Material	Density (lb/gal)	Usage (gal/month)	VOC content (lb/gal)	Potential VOC (lb/year)	Potential VOC (tons/year)	Weight % Toluene	Potential Toluene (tons/year)
Clean-Up Solvent (DX330)	6.37	3.0	6.36	229.08	0.11	5%	0.01
1000 Isopropyl Alcohol	6.55	15.0	6.55	1179.00	0.59	0%	0.00
1100 Methyl Ethyl Ketone	6.71	15.0	6.71	1207.80	0.60	0%	0.00
Totals:						1.31	0.01

Methodology

Potential VOC (lb/year) = Usage (gal/month) * VOC content (lb/gal) * 12 months/year

Potential VOC (tons/year) = Potential VOC (lb/year) * 1 ton/2000 lbs

Potential Methylbenzene (tons/year) = Density (lb/gal) * Usage (gal/month) * Weight % Methylbenzene * 12 months/year * 1 ton/2000 lbs

Metal Etching (ME)

Material	Density (lb/gal)	Usage (gal/month)	% VOC	Potential VOC (tons/yr)	Weight % Hydrofluoric Acid	Potential HF (tons/yr)	Weight % Chromic Acid	Potential Chromic Acid (tons/yr)
Alumiprep	9.68	2.0	14%	0.02	0%	0.00	0%	0.00
Alodine	9.18	6.0	0%	0.00	1%	0.003	1%	0.003
Totals:				0.02		0.003		0.003

Methodology

Potential VOC (ton/yr) = Density (lb/gal) * Usage (gal/month) * % VOC * 12 months/year * 1 ton/2000 lb

Potential HAP (tons/year) = Density (lb/gal) * Usage (gal/month) * Weight % HAP * 12 months/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Insignificant Activities**

Company Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis IN 46241
Minor Permit Revision No.: 097-33301-00702
Reviewer: Heath Hartley
Date: 6/11/13

New Units:

Woodshop

Unit	Dust Collected (lb/hr)	Control Efficiency %	Uncontrolled PM (lb/hr)	Uncontrolled PM (ton/yr)	Controlled PM (ton/yr)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hour)
Woodshop	1.5	99%	1.5	6.6	0.07	0.551

PM = PM10 = PM2.5

Methodology

Uncontrolled PTE (ton/yr) = Dust collected (lb/hr) * 8760 hr/yr * 1 ton/2000 lb

Controlled (ton/yr) = Uncontrolled PTE * (1-Control Efficiency)

Parts Washer (PW)

Material	Density (lb/gal)	Usage (gal/month)	% VOC	Potential VOC (tons/year)
Solvent	6.7	6.67	100%	0.27

Methodology

PTE (ton/yr) = Solvent Usage (gal/month) x 12 months/yr x Density (lbs./gal) x %Volatile x 1 ton/2000 lbs

Spray Gun Cleaner (SGC)

Material	Density (lb/gal)	Usage (gal/month)	% VOC	Potential VOC (tons/year)
Solvent	7	5	100%	0.21

Methodology

PTE (ton/yr) = Solvent Usage (gal/month) x 12 months/yr x Density (lbs./gal) x %Volatile x 1 ton/2000 lbs

Miscellaneous Exterior Spray Painting (MESP)

Material	Usage (gal/hr)	VOC content (lb/gal)	Potential VOC (ton/yr)	HAP (ton/yr)
AxonHentzen ISB-910 Insulator B	0.0007	5.68	0.02	Negl.

Methodology

PTE (ton/yr) = Usage (gal/hr) x VOC content (lb/gal) x 8760 hr/yr x 1 ton/2000 lb

Metal Grinding (MG)

Unit	Max Throughput (ft ³ /hr)	Density (lb/ft ³)	PM EF (lb/ton)	PM10 EF (lb/ton)	Uncontrolled PM (ton/yr)	Uncontrolled PM10 (ton/yr)	HAP (ton/yr)
Grinding	0.08	499.50	0.01	0.0045	0.001	0.0004	Negl.

Methodology

Emission factors from FIRE volume II, Ch. 14 (SCC 3-04-003-60) for Casting Finishing at Grey Iron Foudries

PTE (ton/yr) = Max Throughput (ft³/hr) x Density (lb/ft³) x Emission factor (lb/ton) x 1 ton/2000 lb x 8760 hr/yr x 1 ton/2000 lb

Welding Operations

Emissions from the welding shop are negligible based on using stick electrode 6010 at a rate of 0.006 lb/hr.

	PM	PM10	PM2.5	VOC	Total HAPs	Toluene
Total Insignificant (tons/yr)	6.6	6.6	6.6	1.82	0.01	0.01

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Paint Booths 1 and 2 and Glue Air Walls 3 and 4
and Clean-Up Solvent**

Company Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis IN 46241
Minor Permit Revision No.: 097-33301-00702
Reviewer: Heath Hartley
Date: 6/11/13

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	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 1 and 2 (per booth)																		
Insulator "A"	7.36	68.00%	0.0%	68.0%	0.0%	32.00%	0.25	2.00	12.00	5.00	5.00	2.50	60.06	10.96	2.58	15.64	50%	
Insulator "B"	7.48	76.00%	0.0%	76.0%	0.0%	24.00%	0.25	2.00	12.00	5.68	5.68	2.84	68.22	12.45	1.97	23.69	50%	
Flex Polyester Topcoat	9.15	36.00%	0.0%	36.0%	0.0%	74.00%	0.25	2.00	12.00	3.29	3.29	1.65	39.53	7.21	6.41	4.45	50%	
Nauticoat XP	8.64	46.00%	0.0%	46.0%	0.0%	54.00%	0.25	2.00	12.00	3.97	3.97	1.99	47.69	8.70	5.11	7.36	50%	
530-2153	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	2.00	12.00	7.25	7.25	3.63	87.00	15.88	0.00	n/a	50%	
Polane T Polyurethane Enamel, Carbide Black	8.51	73.00%	0.0%	73.0%	0.0%	27.00%	0.25	2.00	12.00	6.21	6.21	3.11	74.55	13.60	2.52	23.01	50%	
Polane T60 Polyurethane Enamel, Blending White	15.32	36.00%	0.0%	36.0%	0.0%	64.00%	0.25	2.00	12.00	5.52	5.52	2.76	68.18	12.08	10.74	8.62	50%	
High Solids Polyurethane Clear	7.93	62.00%	0.0%	62.0%	0.0%	28.00%	0.25	2.00	12.00	4.92	4.92	2.46	59.00	10.77	3.30	17.56	50%	
Corrosion Protective Epoxy Primer, Green	10.85	26.00%	0.0%	26.0%	0.0%	74.00%	0.25	2.00	12.00	2.82	2.82	1.41	33.85	6.18	6.79	3.81	50%	
Worst Case Coating (Paint Booths 1 and 2, each)												3.63	87.00	15.88	10.74			
Glue Air Walls 3 and 4 (per air wall)																		
3M Scotch-Weld Neoprene High Performance Contact	6.8	80.00%	14.0%	66.0%	14.0%	20.00%	0.125	1.00	3.00	5.22	4.49	0.56	13.45	2.46	0.37	22.44	50%	

Total PTE (Paint Booths 1 and 2 and Glue Air Walls 3 and 4) 8.37 200.93 36.67 22.22

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 = Sum of worst case coating for each booth
 Note: VOC from catalysts is assumed not to volatilize. Therefore, catalyst materials are not included in these calculations.

Potential to Emit VOC and HAPs

	Density (lb/gal)	Usage (gal/month)	VOC content (lb/gal)	Potential VOC (lb/year)	Potential VOC (tons/year)	Weight % Toluene	Potential Toluene (tons/year)
Clean-Up Solvent (DX330)	6.37	3.0	6.3634	229.08	0.11	5%	0.01

Methodology

Potential VOC (lb/year) = Usage (gal/month) * VOC content (lb/gal) * 12 months/year
 Potential VOC (tons/year) = Potential VOC (lb/year) * 1 ton/2000 lbs
 Potential Methylbenzene (tons/year) = Density (lb/gal) * Usage (gal/month) * Weight % Methylbenzene * 12 months/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations
Paint Booths 1 and 2 and Glue Air Walls 3 and 4**

Company Name: Comlux Aviation
Source Address: 2910 South High School Road, Indianapolis IN 46241
Minor Permit Revision No.: 097-33301-00702
Reviewer: Heath Hartley
Date: 6/11/13

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight %						Potential to Emit (PTE) (tons/year)							
				MIBK	Toluene	Styrene	Xylene	Methyl Methacrylate	Hexane	MIBK	Toluene	Styrene	Xylene	Methyl Methacrylate	Hexane	Total HAP	
Paint Booths 1 and 2 (per booth)																	
Insulator "A"	7.36	0.25	2.00	25.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.03	4.03	0.00	0.00	0.00	0.00	8.06
Insulator "B"	7.48	0.25	2.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Flex Polyester Topcoat	9.15	0.25	2.00	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	0.00	0.00	8.02	0.00	0.00	0.00	0.00	8.02
Nauticoat XP	8.64	0.25	2.00	1.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.19	0.00	0.00	1.89	0.00	0.00	0.00	2.08
530-2153	7.25	0.25	2.00	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00	3.18	0.00	0.00	0.00	0.00	0.00	3.18
Polane T Polyurethane Enamel, Carbide Black	8.51	0.25	2.00	0.00%	8.00%	0.00%	4.00%	0.00%	0.00%	0.00	1.49	0.00	0.75	0.00	0.00	0.00	2.24
Polane T60 Polyurethane Enamel, Blending White	15.32	0.25	2.00	10.00%	0.00%	0.00%	1.00%	0.00%	0.00%	3.36	0.00	0.00	0.34	0.00	0.00	0.00	3.69
High Solids Polyurethane Clear	7.93	0.25	2.00	0.00%	0.00%	1.00%	40.00%	1.00%	0.00%	0.00	0.00	0.17	6.95	0.17	0.00	0.00	7.29
Corrosion Protective Epoxy Primer, Green	10.85	0.25	2.00	0.00%	8.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.43	0.00	0.00	0.00	0.00	0.00	1.43
Worst Case Coating (Paint Booths 1 and 2, each)											4.03	4.03	8.02	6.95	0.17	0.00	8.06
Glue Air Walls 3 and 4 (per air wall)																	
3M Scotch-Weld Neoprene High Performance Contact Adhesive 1357	6.8	0.125	1.00	0.00%	7.00%	0.00%	0.00%	0.00%	20.00%	0.00	0.26	0.00	0.00	0.00	0.00	0.74	1.01
Total PTE (Paint Booths 1 and 2 and Glue Air Walls 3 and 4)											8.06	8.58	16.03	13.89	0.35	1.49	18.13

METHODOLOGY

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Wally Turner
Comlux Aviation
2910 S High School Rd
Indianapolis, IN 46241

DATE: July 22, 2013

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

SUBJECT: Final Decision
FESOP - Minor Permit Revision
097 - 33301 - 00702

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:
Harold Balcerak Quality Assurance Mgr Comlux Aviation
Alic Bent August Mack Environmental, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	LPOGOST 7/22/2013 Comlux Aviation 097 - 33301 - 00702 final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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2		Harold Balcerak Quality Assurance Mgr Comlux Aviation 2910 S High School Rd Indianapolis IN 46241 (RO CAATS)									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
4		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
6		Crows Nest Town Council 700 W 56th Street Indianapolis IN 46228 (Local Official)									
7		Homecroft Town Council PO Box 47123 Indianapolis IN 47123 (Local Official)									
8		Meridian Hills Town Council P.O. Box 40437 Indianapolis IN 45240 (Local Official)									
9		Rocky Ripple Town Council 930 West 54th Street Indianapolis IN 46208 (Local Official)									
10		Williams Creek Town Council 620 Forest Blvd. Indianapolis IN 46240 (Local Official)									
11		Wynnedale Town Council 4265 Knollton Road Indianapolis IN 46228 (Local Official)									
12		Mr. Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 (Consultant)									
13		Matt Mosier Office of Sustainability 1200 S Madison Ave #200 Indianapolis IN 46225 (Local Official)									
14											
15											

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