



## 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](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

TO: Interested Parties / Applicant

DATE: November 14, 2013

RE: Independent Protection Co., Inc./039-33680-00448

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

### Notice of Decision – Approval

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

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

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

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

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

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

Enclosures  
FNPER-AM.dot 6/13/2013



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Janet Kercher-Dudley  
Independent Protection Company, Inc.  
67819 State Road 15  
New Paris, Indiana 46553

November 14, 2013

Re: 039-33680-00448  
First Administrative Amendment to  
F039-26868-00448

Dear Ms. Kercher-Dudley:

Independent Protection Company, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F039-26868-00448 on January 23, 2009 for a stationary specialty van/transport manufacturing source located at 67819 State Road 15, New Paris, IN 46553. On September 23, 2013 the Office of Air Quality (OAQ) received an application from the source requesting to the construction and operation of additional surface coating, natural gas combustion, and woodworking units.

Pursuant to 326 IAC 2-8-10(a)(10), this change to the permit is considered an administrative amendment because the permit is amended to incorporate a modification that adds an emissions unit of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emission Offset).

The following are the new emissions units:

- (a) One (1) operation for the assembly of specialty vehicles, identified as MPV, approved for construction in 2013, processing a maximum of 0.0236 vehicles per hour, using high volume low pressure (HPLV) application to apply adhesives, and aerosol cans and brushing, wiping or dabbing to apply other coatings and cleaners, with hand held baffles to control particulate matter overspray emissions from the air atomization spray coating and aerosol cans, exhausting inside the building.
- (b) Woodworking operations including the following:
  - (1) One (1) mill room woodworking operation, identified as WW1, approved for construction in 2013, including one (1) band saw, one (1) table saw, one (1) chop saw, and one (1) belt sander, with a maximum wood throughput of 11.16 pounds per hour, with a dust collector for particulate control, exhausting inside the building.
  - (2) One (1) cabinet shop woodworking operation, identified as WW2, approved for construction in 2013, including one (1) table saw, one (1) chop saw, one (1) belt sander, one (1) routing table, one (1) pocket machine, and one (1) hinge table, with a maximum wood throughput of 3.17 pounds per hour, with a dust collector for particulate control, exhausting inside the building.
- (c) One (1) space heater, identified as H47, approved for construction in 2013, with a maximum heat input capacity of 0.06 MMBtu/hr.
- (d) One (1) space heater, identified as H48, approved for construction in 2013, with a maximum heat input capacity of 0.10 MMBtu/hr.



A State that Works

- (e) One (1) space heater, identified as H49, approved for construction in 2013, with a maximum heat input capacity of 0.125 MMBtu/hr.
- (f) Two (2) space heater, identified as H50 and H51, approved for construction in 2013, each with a maximum heat input capacity of 0.15 MMBtu/hr.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

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

### PTE of Proposed Modification

The PTE of the modification is as follows:

Process/ Emission Unit	PTE of Proposed Modification (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
MPV	0.76	0.76	0.76	0.00	0.00	2.31	0.00	0.00	0.51	0.23 (PCE)
Natural Gas Combustion	0.00	0.02	0.02	0.00	0.25	0.01	0.21	303	0.00	0.00
Woodworking	1.12	1.12	1.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Proposed Modification</b>	<b>1.88</b>	<b>1.90</b>	<b>1.90</b>	<b>0.00</b>	<b>0.25</b>	<b>2.33</b>	<b>0.21</b>	<b>303</b>	<b>0.51</b>	<b>0.23 (PCE)</b>
PCE = perchloroethylene (tetrachloroethylene)										

- (a) The entire source will continue to limit VOC emissions to less than 100 tons per twelve and HAPs to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 (Part 70) not applicable (see Appendix A for the calculations).
- (b) 326 IAC 8-1-6 (New Facilities, General Reduction Requirements)  
The requirements of 326 IAC 8-1-6 apply to facilities constructed after January 1, 1980 with potential VOC emissions of greater than 25 tons per year. None of the facilities at this source have potential VOC emissions of greater than 25 tons per year; therefore, the requirements of this rule do not apply.

- (c) 326 IAC 8-2-9 (Miscellaneous Metal Coating)  
The surface coating of metal parts in the specialty vehicle assembly operation, MPV, is not subject to the requirements of 326 IAC 8-2-9 because pursuant to 326 IAC 8-2-1(a)(3), facilities existing as of July 1, 1990 located in Elkhart County are exempt from 326 IAC 8-2-9 if actual emissions of VOC are less than 15 pounds per day. Potential VOC emissions from the surface coating of metal parts in the specialty vehicle assembly operation are less than 15 pounds per day; therefore, this operation is not subject to 326 IAC 8-2-9.

- (d) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(15), the application of bulk adhesives using air atomization spray coating in the MPV assembly operation is not subject to the requirements of this rule, because this operation uses less than 5 gallons per day of coating.

Pursuant to 326 IAC 6-3-1(b)(12), the application of aerosol coating products using disposable hand-held aerosol cans in the MPV assembly operation is not subject to the requirements of this rule.

Pursuant to 326 IAC 6-3-1(b)(8), the surface coating using brush coating in the MPV assembly operation is not subject to this rule.

Since there are no particulate emissions from the surface coating using wiping or dabbing in the MPV assembly operation, it is not subject to this rule.

- (e) 326 IAC 6-3-2 (e) (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2 the particulate matter (PM) from wood working operations, identified as P2, shall be limited to less 2.03 pounds per hour, when operating at a process weight rate of 700 pounds per hour, which is equivalent to 8.9 tons per year.

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:

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

OAQ has determined the control devices are integral to each of the wood working operations. Potential emissions were calculated after controls. The respective control device system, must be in operation at all times when the wood working is in operation in order to comply with this limit. The Permittee shall operate the control device in accordance with manufacturer's specifications.

- (f) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
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. This limit applies to the mill room woodworking operation, identified as WW1 and to the cabinet shop woodworking operation, identified as WW2, because the process weight rate is less than 100 pounds per hour.

In order to comply with this limit, the associated dust collectors must be in operation while the woodworking operations (WW1 and WW2) are in operation.

- (g) The paint shop spray booth (PB1) and paint touch up booth (PB4) are considered existing affected sources under the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Source, 40 CFR 63, Subpart HHHHHH, since they are

surface coating operations that use a coating that contains chromium and were constructed before September 17, 2007.

The facilities subject to this rule include the following:

- (a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausts through stack S1A & B;
- (b) One (1) paint touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 bus per hour, and exhausting through S4;

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11169(c)
- (2) 40 CFR 63.11170
- (3) 40 CFR 63.11171(b) and (c)
- (4) 40 CFR 63.11172(b)
- (5) 40 CFR 63.11173(e), (f), and (g)
- (6) 40 CFR 63.11174
- (7) 40 CFR 63.11175
- (8) 40 CFR 63.11176(a)
- (9) 40 CFR 63.11177(a), (b), (c), (d), and (g)
- (10) 40 CFR 63.11178
- (11) 40 CFR 63.11179
- (12) 40 CFR 63.11180
- (13) Table 1

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the paint shop spray booth (PB1) and paint touch up booth (PB4) except as otherwise specified in 40 CFR 63, Subpart HHHHHH.

- (h) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this administrative amendment.

<b>PTE of the Entire Source After Issuance of the FESOP Administrative Amendment</b>
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The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10 <sup>(2)</sup>	PM2.5*	SO <sub>2</sub>	NOx	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Paint shop spray booths and glue operation (PB1, P4, PB2, PB3, P5 and P6)	63.88 <sup>(3)</sup>	63.88 <sup>(3)</sup>	63.88 <sup>(3)</sup>	0.0	0.0	<99.0 <sup>(1)</sup>	0.0	<b>0.0</b>	<24.9 <sup>(1)</sup>	<9.9 <sup>(1)</sup> (Toluene)
Surface Preparation (SP)	21.36	21.36	21.36	0.0	0.0	0.0	0.0	<b>0.0</b>	0.0	0.0
Woodworking operations (P2)	8.89 <sup>(2)</sup>	8.89 <sup>(2)</sup>	8.89 <sup>(2)</sup>	0.0	0.0	0.0	0.0	<b>0.0</b>	0.0	0.0
Welding operation	0.48	0.48	0.48	0.0	0.0	0.0	0.0	<b>0.0</b>	0.30	0.29 (Lead)
(42) Natural gas Space Heaters	<del>0.09</del> <b>0.13</b>	<del>0.35</del> <b>0.51</b>	<del>0.35</del> <b>0.51</b>	<del>0.03</del> <b>0.04</b>	<del>3.18</del> <b>6.69</b>	<del>0.25</del> <b>0.37</b>	<del>3.87</del> <b>5.62</b>	<b>8,071</b>	<del>0.087</del> <b>0.13</b>	<del>0.083</del> <b>0.12</b> (Hexane)
Band Saw Operation	0.01	0.01	0.01	0.0	0.0	0.0	0.0	<b>0.0</b>	0.0	0.0
<b>MPV</b>	<b>0.76</b>	<b>0.76</b>	<b>0.76</b>	<b>0.00</b>	<b>0.0</b>	<b>2.31</b>	<b>0.0</b>	<b>0.0</b>	<b>0.51</b>	<b>0.23</b> (PCE)
<b>New Woodworking</b>	<b>1.12</b>	<b>1.12</b>	<b>1.12</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<b>New Natural Gas Combustion</b>	<b>0.005</b>	<b>0.02</b>	<b>0.02</b>	<b>0.002</b>	<b>0.25</b>	<b>0.01</b>	<b>0.21</b>	<b>303</b>	<b>4.7E-3</b>	<b>4.5E-3</b> (Hexane)
<b>Total PTE of Entire Source</b>	<del>94.72</del> <b>96.63</b>	<del>92.11</del> <b>97.03</b>	<del>92.11</del> <b>97.03</b>	<del>0.03</del> <b>0.04</b>	<del>3.18</del> <b>6.94</b>	<del>&lt;99.25</del> <b>&lt;99.38</b>	<del>3.87</del> <b>5.83</b>	<b>8,374</b>	Less than 25	Less than 10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

PCE = perchloroethylene (tetrachloroethylene)  
 \* 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". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.  
<sup>(1)</sup> Existing VOC emission limits are based on 326 IAC 2-8-4 (FESOP) limitations specified in FESOP 039-10339-00448.  
<sup>(2)</sup> Based on the allowable PTE and limitations specified in FESOP 039-10339-00448.  
<sup>(3)</sup> Represents the potential to emit before controls. Actual emissions will be less than 63.88 tons per year because the PM emissions are controlled by dry filters with a average transfer efficiency of 75%.

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).

PCE = perchloroethylene (tetrachloroethylene)

\* 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". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

(1) Existing VOC emission limits are based on 326 IAC 2-8-4 (FESOP) limitations specified in FESOP 039-10339-00448.

(2) Based on the allowable PTE and limitations specified in FESOP 039-10339-00448.

(3) Represents the potential to emit before controls. Actual emissions will be less than 63.88 tons per year because the PM emissions are controlled by dry filters with a average transfer efficiency of 75%.

Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**:

1. Section A.2 and A.3 have been amended as follows to incorporate the new units and to specify that the paint shop spray booth (PB1) and paint touch up booth (PB4) are existing affected sources under the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Source, 40 CFR 63, Subpart HHHHHH:

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

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

- (a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLV) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausts through stack S1A & B;

**The spray booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.**

- (b) One (1) paint touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 bus per hour, and exhausting through S4;

**The touch up booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.**

\*\*\*\*\*

- (i) **One (1) assembly operation for specialty vehicles, identified as MPV, approved for construction in 2013, processing a maximum of 0.0236 vehicles per hour, using high volume low pressure (HPLV) application to apply adhesives, and aerosol cans and brushing, wiping or dabbing to apply other coatings and cleaners, with hand held baffles to control particulate matter overspray emissions from the air atomization spray coating and aerosol cans, exhausting inside the building.**

- (j) **Woodworking operations including the following:**

- (1) **One (1) mill room woodworking operation, identified as WW1, approved for construction in 2013, including one (1) band saw, one (1) table saw, one (1) chop saw, and one (1) belt sander, with a maximum wood throughput of 11.16 pounds per hour, with a dust collector for particulate control, exhausting inside the building.**
- (2) **One (1) cabinet shop woodworking operation, identified as WW2, approved for construction in 2013, including one (1) table saw, one (1) chop saw, one (1) belt sander, one (1) routing table, one (1) pocket machine, and one (1) hinge table, with a maximum wood throughput of 3.17 pounds per hour, with a dust collector for particulate control, exhausting inside the building.**

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

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This stationary source also includes the following insignificant activities:

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- (p) **One (1) space heater, identified as H47, approved for construction in 2013, with a maximum heat input capacity of 0.06 MMBtu/hr.**
- (q) **One (1) space heater, identified as H48, approved for construction in 2013, with a**



**maximum heat input capacity of 0.10 MMBtu/hr.**

- (r) One (1) space heater, identified as H49, approved for construction in 2013, with a maximum heat input capacity of 0.125 MMBtu/hr.**
- (s) Two (2) space heater, identified as H50 and H51, approved for construction in 2013, each with a maximum heat input capacity of 0.15 MMBtu/hr.**

2. Section D.1 has been amended as follows to incorporate the new units and to incorporate the current language contained in the most recent version of 326 IAC 8-2-9(f):

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

- (a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausting through stack S1A & B.

**The spray booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.**

- (b) One (1) paint shop touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 bus per hour, and exhausting through S4.

**The touch up booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.**

\*\*\*\*\*

- (i) **One (1) assembly operation for specialty vehicles, identified as MPV, approved for construction in 2013, processing a maximum of 0.0236 vehicles per hour, using high volume low pressure (HPLV) application to apply adhesives, and aerosol cans and brushing, wiping or dabbing to apply other coatings and cleaners, with hand held baffles to control particulate matter overspray emissions from the air atomization spray coating and aerosol cans, exhausting inside the building.**

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

##### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total VOC usage at the paint shop operation - PB1, P4, PB2, PB3, terra glue operation - P5 ~~and~~, turtle top glue operation - P6, **and assembly operation - MPV**, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

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##### D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The total usage of any single hazardous air pollutant (HAP) at the paint shop operation - PB1, P4, PB2, PB3, terra glue operation - P5 ~~and~~, turtle top glue operation - P6 **and assembly operation - MPV** shall be limited to less than 9.9 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide

potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The total usage of all hazardous air pollutants (HAPs) at the paint shop operation - PB1, P4, PB2, PB3, terra glue operation - P5, and turtle top glue operation - P6 **and assembly operation - MPV** shall be limited to less than 24.9 tons per twelve (12) consecutive month period. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month.

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#### D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), **the Permittee shall comply with the following work practices for the paint shop operation - PB1, P4, PB2 and PB3:** ~~Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

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

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

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3. Section D.2 has been amended as follows:

## SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

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**(j) Woodworking operations including the following:**

- (1) One (1) mill room woodworking operation, identified as WW1, approved for construction in 2013, including one (1) band saw, one (1) table saw, one (1) chop saw, and one (1) belt sander, with a maximum wood throughput of 11.16 pounds per hour, with a dust collector for particulate control, exhausting inside the building.**
- (2) One (1) cabinet shop woodworking operation, identified as WW2, approved for construction in 2013, including one (1) table saw, one (1) chop saw, one (1) belt sander, one (1) routing table, one (1) pocket machine, and one (1) hinge table, with a maximum wood throughput of 3.17 pounds per hour, with a dust collector for particulate control, exhausting inside the building.**

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### D.2.1 Particulate [326 IAC 6-3-2]

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- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations (WW1 and WW2) shall each not exceed 0.55 pounds per hour when each operating at a process weight rate of less than 100 pounds per hour.**

### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its down draft dry filters C3 and C5, integral cyclones C-2A and C-2B, and integral fabric filter UFO-401. **these facilities and any control devices.**

\*\*\*\*\*

### D.2.3 Particulate Control

\*\*\*\*\*

- (c) In order to comply with condition D.2.1 (c), the respective dust collectors for particulate control shall be in operation and control emissions from the woodworking operations at all times while the woodworking facility is in operation.**

\*\*\*\*\*

### D.2.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the visible emission notations of the wood working operation P2 and surface prep SP stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e.g., the process did not operate that day).**

4. Section E.1 has been added as follows to incorporate the requirements of 40 CFR 63, Subpart HHHHHH:

## SECTION E.1

## OPERATION CONDITIONS

**Emissions Unit Description:**

- (a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausts through stack S1A & B;

The spray booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.

- (b) One (1) paint touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 bus per hour, and exhausting through S4;

The touch up booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.

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

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

**E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.11174, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for paint shop spray booth (PB1) and paint touch up booth (P4) as specified in Appendix A of 40 CFR Part 63, Subpart HHHHHH in accordance with the schedule in 40 CFR 63 Subpart HHHHHH.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

**E.1.2 National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH] [326 IAC 20-88]**

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment A of this permit), which are incorporated by reference as 326 IAC 20-88, except as otherwise specified in 40 CFR Part 63, Subpart HHHHHH, for paint shop spray booth (PB1) and paint touch up booth (P4):

- (1) 40 CFR 63.11169(c)
- (2) 40 CFR 63.11170
- (3) 40 CFR 63.11171(c)
- (4) 40 CFR 63.11172(b)
- (5) 40 CFR 63.11173(e), (f), and (g)
- (6) 40 CFR 63.11174
- (7) 40 CFR 63.11175
- (8) 40 CFR 63.11176
- (9) 40 CFR 63.11177(a), (b), (c), (d), and (g)

- (10) 40 CFR 63.11178
- (11) 40 CFR 63.11179
- (12) 40 CFR 63.11180
- (13) Table 1

4. The reporting forms have been amended as follows to incorporate the new units:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Independent Protection Company, Inc., Turtle Top Division  
Source Address: 67819 State Road 15, New Paris, Indiana 46553  
~~Mailing Address: 67819 State Road 15, New Paris, IN 46553~~  
FESOP Permit No.: F 039-26868-00448  
Facility: paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation - P5, **and turtle top glue operation - P6, and assembly operation - MPV**  
Parameter: VOC, single and combined HAPs usages  
Limit: (a) total VOC usage at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation - P5, **and turtle top glue operation - P6, and assembly operation - MPV**, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.0 tons per twelve (12) consecutive month period  
(b) total usage of any single hazardous air pollutant (HAP) at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation - P5, **and turtle top glue operation - P6, and assembly operation - MPV**, shall be limited to less than 9.9 tons per twelve (12) consecutive month period  
(c) combined usage of all hazardous air pollutants (HAPs) at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation - P5, **and turtle top glue operation - P6, and assembly operation - MPV**, shall be limited to less than 24.9 tons per twelve (12) consecutive month period

### **Additional Changes**

IDEM, OAQ made the additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit (PTE) 100,000 tons per year or more of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e). Therefore, CO<sub>2</sub>e emissions have been calculated for this source. Based on the calculations, the unlimited PTE GHGs from the entire source is less than 100,000 tons of CO<sub>2</sub>e per year (see Appendix A for the calculations). This did not require any changes to the permit.
2. Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". In addition, all occurrences of IDEM's mailing addresses have been updated in the permit to include a mail code (MC) and to have a zip code of 46204-2251. Finally, all occurrences of the Compliance Data Branch telephone and facsimile numbers have been revised to 317-233-~~5674~~ **0178** and 317-233-~~5967~~ **6865**, respectively, and the phone number for the OAQ, Billing, Licensing, and Training Section (BLT) in Section B - Annual Fee Payment has been revised to 317-233-~~4230~~ **4320**.
3. Section A.1 of the permit and the reporting forms have been revised to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
4. For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligations with regard to the records required by this condition."
5. IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timelines have been switched to "no later than" or "not later than" except when the underlying rule states "within."
6. IDEM has decided to clarify throughout the permit that a certification needs to meet the requirements of 326 IAC 2-8-5(a)(1). In addition, IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the conditions requiring the forms already addresses this issue.
7. IDEM has decided to clarify the certification requirements in Section B - Duty to Provide Information and Section B - Certification.
8. IDEM has decided to clarify the requirements of Section B – Preventive Maintenance Plan and to add a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans.
9. IDEM has revised the language of the Section B - Preventive Maintenance Plan, Section C - Compliance Monitoring, Section C - General Record Keeping, and Section C - General Reporting to allow the Permittee to not have to begin implementing the requirements of these conditions until ninety days after initial start up.
10. IDEM has added the telephone and facsimile information for the Southwest and Southeast Regional Offices to Section B - Emergency Provisions.

11. IDEM has revised Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.
12. IDEM has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviations from Permit Requirements and Conditions and added the requirements of that condition to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the report.
13. IDEM has revised Section B - Permit Renewal paragraph (c) to state which rule establishes the authority to set a deadline for the Permittee to submit additional information.
14. IDEM has decided to reference 326 IAC 2 in Section B - Source Modification Requirements, rather than specific construction rule.
15. IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
16. IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
17. IDEM has revised the language of the Section C - Asbestos Abatement Projects to change the terminology "Accredited" to "Licensed" in order to match the rule. In addition IDEM has revised the language of the Section C - Asbestos Abatement Projects to remove the statement that the requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable, since all conditions and requirements in a FESOP are federally enforceable.
18. IDEM has removed the first paragraph of Section C - Performance Testing as due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
19. IDEM has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been change to clearly indicate that it is the Permittee that must follow the requirements of the condition
20. IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
21. IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
22. IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps

related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

23. The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
24. IDEM has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.
25. IDEM has decided to clarify Section D - Testing Requirements.
26. The word "status" has been added to Section D - Record Keeping Requirements and Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
27. The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report Form to match the underlying rule.

The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

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

- (a) ~~This permit, F 039-26868-00448, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.~~
- (b) ~~If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.~~

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

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

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



~~B.4 — Enforceability [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.5 — 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.6 — 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.7 — 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. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.~~

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

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

~~(a) — Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~

~~(b) — One (1) certification shall be included, using the attached Certification Form, 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.9 — 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. All 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 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.~~

- (e) ~~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 the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~B.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]~~

- (a) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.~~
- (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 or potential to emit. The PMPs do not require the certification 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.12 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, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;~~

~~Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or~~

~~Telephone Number: 317-233-0178 (ask for Compliance Section)~~

~~Facsimile Number: 317-233-6865~~

~~Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.~~

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

~~Indiana Department of Environmental Management~~

~~Compliance 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 the certification 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.~~
- ~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

~~B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]~~

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- ~~(a) All terms and conditions of permits established prior to F 039-26868-00448 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]~~

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~~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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]~~

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- ~~(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251~~

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

~~B.16 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]~~

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- ~~(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 the certification 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.17 Permit Renewal [326 IAC 2-8-3(h)]~~

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- ~~(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 the certification 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

- ~~(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 in writing by IDEM, OAQ any additional information identified as being needed to process the application.~~

~~B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]~~

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- ~~(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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~
- ~~Any such application shall be certified 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.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]~~

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

~~(1) The changes are not modifications under any provision of Title I of the Clean Air Act;~~

~~(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;~~

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

~~(4) The Permittee notifies the:~~

~~Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

~~and~~

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

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

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

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

~~(b) Emission Trades [326 IAC 2-8-15(c)]~~

~~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(c).~~

~~(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]~~

~~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.~~

~~B.20 Source Modification Requirement [326 IAC 2-8-11.1]~~

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~~A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.~~

~~B.21 — 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]~~

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~~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.22 — 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

~~The application which shall be submitted by the Permittee does require the certification 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.23 — 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]~~

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- ~~(a) — The Permittee shall pay annual fees to IDEM, OAQ within 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.24 — Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]~~

- ~~(a) — The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.~~
- ~~(b) — Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.~~

~~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 volatile organic compounds (VOCs) 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 regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.~~
- ~~(3) — 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~~

- ~~(4) 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.~~
- ~~(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]~~

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~~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:~~

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

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

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~~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 or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.~~

~~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  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

~~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 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]~~

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- (a) ~~All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

~~A test protocol, except as provided elsewhere in this permit, shall be submitted to:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, 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 certification 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 certification 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)]~~

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

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~~Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 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 the certification 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 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

~~Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.~~

~~C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]~~

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

~~(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.~~

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

~~C.13 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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]~~

~~(a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.~~

~~(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:~~

~~(1) initial inspection and evaluation;~~

~~(2) recording that operations returned 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 within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~

~~(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 maintain the following records:~~
  - ~~(1) — monitoring data;~~
  - ~~(2) — monitor performance data, if applicable; and~~
  - ~~(3) — corrective actions taken.~~

~~C.15 — 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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~
- ~~(b) — A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) 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 the certification 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.16 — 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. 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial startup, whichever is later.~~

~~C.17 — 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. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported.~~

~~This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, 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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(e) 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.18 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 the standards for recycling and emissions reduction:~~

- ~~(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- ~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~
- ~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

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

---

- (a) This permit, F039-26868-00448, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

---

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

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

**B.4 Enforceability [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.5 Severability [326 IAC 2-8-4(4)]**

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

**B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

**B.8 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.9 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. All 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.
- (d) 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.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
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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.

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

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

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and**
- (C) Corrective actions taken.**

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

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

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

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**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F039-26868-00448 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.

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**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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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.

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**B.15 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]**

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- (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)]

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**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (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(42). 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.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (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.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (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.19 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.20 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]**

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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.21 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.22 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.23 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 CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

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

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

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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]**

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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]**

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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)]**

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
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 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, 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).

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**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)]**

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**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.

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**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]**

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- (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]**

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- (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) 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**

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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.

\*\*\*\*\*

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

---

A Preventive Maintenance Plan, ~~in accordance with Section B – Preventive Maintenance Plan, of this permit,~~ is required for ~~this facility~~ **these facilities** and any control devices. **Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

\*\*\*\*\*

D.1.9 Monitoring

- 
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S1 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. ~~in accordance with 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 ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack 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 steps. ~~in accordance with 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 ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

\*\*\*\*\*

D.1.10 Record Keeping Requirements

- 
- (a) To document **the compliance status** with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and HAP emission limits established in Conditions D.1.1, and D.1.2 . Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

\*\*\*\*\*

- (b) To document **the compliance status** with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC requirement and content limits established in Conditions D.1.3. **Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.**

\*\*\*\*\*

- (3) The volume weighted average VOC content of **all** the coatings used ~~for each coating for metal surface coating~~ **within each of the paint booths PB1, P4, PB2 and PB3.**

\*\*\*\*\*

- (c) To document **the compliance status** with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, **and** daily and monthly inspections, ~~and those additional inspections prescribed by the Preventive Maintenance Plan.~~



- (d) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements, of this permit **contains the Permittee's obligations with regard to the records required by this condition.**

#### D.1.11 Reporting Requirements

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~~A Quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within no 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 the a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by ~~the~~ an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

\*\*\*\*\*

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

---

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility these facilities and any control devices.~~ **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

\*\*\*\*\*

#### D.2.5 Visible Emissions Notations

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- (a) Visible emission notations of the wood working operation P2 and surface prep SP stack exhausts shall be performed once per day during normal daylight operations ~~when venting to the atmosphere.~~ A trained employee shall record whether emissions are normal or abnormal.

\*\*\*\*\*

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. ~~in accordance with 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 ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

\*\*\*\*\*

#### D.2.7 Record Keeping Requirements

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- (b) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements, of this permit **contains the Permittee's obligations with regard to the records required by this condition.**

\*\*\*\*\*

#### FESOP CERTIFICATION FORM:

...  
Mailing Address: ~~67819 State Road 15, New Paris, IN 46553~~  
...

#### FESOP EMERGENCY OCCURRENCE REPORT FORM:

...  
Mailing Address: ~~67819 State Road 15, New Paris, IN 46553~~  
...

~~A certification is not required for this report.~~

...

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 Brian Wright of my staff at 317-234-6544 or 1-800-451-6027, and ask for extension 4-6544.

Sincerely,



Nathan Bell, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit

NB/BW

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



## 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](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

# Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Independent Protection Company, Inc., Turtle Top Division  
67819 State Road 15  
New Paris, Indiana 46553**

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

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

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

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

Operation Permit No. F039-26868-00448

Issued by:


Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Issuance Date: January 23, 2009

Expiration Date: January 23, 2019

First Administrative Amendment No. 039-33680-00448

Issued by:

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

Issuance Date: November 14, 2013

Expiration Date: January 23, 2019

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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 specialty van/transport manufacturing source.

Source Address:	67819 State Road 15, New Paris, Indiana 46553
General Source Phone Number:	574-831-4340
SIC Code:	3713
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 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 consists of the following emission units and pollution control devices:

- (a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLV) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausts through stack S1A & B;

The spray booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.

- (b) One (1) paint touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 bus per hour, and exhausting through S4;

The touch up booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.

- (c) One (1) frame painting booth in building #9, approved for construction in 2008, identified as PB2, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray guns, wiping and dipping as methods of application, equipped with forty eight dry filters, and exhausting through stack S6;

- (d) One (1) undercoating paint booth in building #9, approved for construction in 2008, identified as PB3, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray guns, wiping and dipping as methods of application, equipped with a dry filter, and exhausting through stack S7;

- (e) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.29 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building;

- (f) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.36 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building;
- (g) One (1) surface preparation operation consisting of polishing, buffing, surface grinding and sanding using handheld equipment in building #5, constructed in 2007, identified as SP, with a maximum capacity of 0.65 vehicle units per hour, equipped with two downdraft cartridge filters, C3 and C5, for particulate control, and exhausting through stacks S3 and S5; and
- (h) Wood Working Operation with a combined process weight rate of 700 pounds of wood per hour (P2):
  - (1) One (1) woodworking operation, constructed in 1978, equipped with two integral cyclones, C-2A and C-2B, each with an airflow rate of less than 4000 acfm, to control particulates, and exhausting to stacks S2A and S2B, respectively.
  - (2) One (1) table saw, constructed in 2008, identified as table saw, equipped with an integral fabric filter (UFO-101) with a flow rate of 1185 actual cubic feet per minute, and outlet grain loading of 0.016 dscf.
- (i) One (1) assembly operation for specialty vehicles, identified as MPV, approved for construction in 2013, processing a maximum of 0.0236 vehicles per hour, using high volume low pressure (HPLV) application to apply adhesives, and aerosol cans and brushing, wiping or dabbing to apply other coatings and cleaners, with hand held baffles to control particulate matter overspray emissions from the air atomization spray coating and aerosol cans, exhausting inside the building.
- (j) Woodworking operations including the following:
  - (1) One (1) mill room woodworking operation, identified as WW1, approved for construction in 2013, including one (1) band saw, one (1) table saw, one (1) chop saw, and one (1) belt sander, with a maximum wood throughput of 11.16 pounds per hour, with a dust collector for particulate control, exhausting inside the building.
  - (2) One (1) cabinet shop woodworking operation, identified as WW2, approved for construction in 2013, including one (1) table saw, one (1) chop saw, one (1) belt sander, one (1) routing table, one (1) pocket machine, and one (1) hinge table, with a maximum wood throughput of 3.17 pounds per hour, with a dust collector for particulate control, exhausting inside the building.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each;
  - (1) Twenty eight (28) space heaters, with a total heat input of 4.387 MMBtu per hour;
  - (2) Thirteen (13) natural gas-fired space heaters and air make-up units, constructed in 2007, with a total heat input capacity of 10.535 MMBtu per hour, exhausting outdoors;



- (3) One (1) natural gas-fired space heater, constructed in 2008, identified as H46, with a maximum heat input capacity of 0.6563 MMBtu/hr, and exhausting indoors.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (d) Packaging lubricants and greases;
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (f) Cleaners and solvents characterized as having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20oC (68oF);
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5];
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 2-7-1(21)(G)(vi)(EE).
  - (1) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs; 326 IAC 2-7-1(21)(G)(ix)(AA).
  - (2) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs; 326 IAC 2-7-1(21)(G)(ix)(EE).
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (j) Paved and unpaved roads and parking lots with public access;
- (k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (m) Filter or coalescer media changeout;
- (n) Welding of specialty van and bus assembly components, equipped with two dust collectors GS-4 and GS-16 installed in 2008, and exhausting inside; and
- (o) One (1) band saw operation, approved for construction in 2008, identified as band saw, to cross cut 1" x 1" and 1" x 2" 14 gauge steel tubing, with a capacity of 48 feet of 1" tubing cut per hour and 63 pounds per hour of raw material.

- (p) One (1) space heater, identified as H47, approved for construction in 2013, with a maximum heat input capacity of 0.06 MMBtu/hr.
- (q) One (1) space heater, identified as H48, approved for construction in 2013, with a maximum heat input capacity of 0.10 MMBtu/hr.
- (r) One (1) space heater, identified as H49, approved for construction in 2013, with a maximum heat input capacity of 0.125 MMBtu/hr.
- (s) Two (2) space heater, identified as H50 and H51, approved for construction in 2013, each with a maximum heat input capacity of 0.15 MMBtu/hr.

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

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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) to renew a Federally Enforceable State Operating Permit (FESOP).

**SECTION B****GENERAL CONDITIONS****B.1 Definitions [326 IAC 2-8-1]**

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

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- (a) This permit, F039-26868-00448, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

**B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]**

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

**B.5 Severability [326 IAC 2-8-4(4)]**

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

**B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

**B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

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

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

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- (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. All 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.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

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(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The 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.

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

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

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

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

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

Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

- (A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

#### B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F039-26868-00448 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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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.15 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.16 Permit Renewal [326 IAC 2-8-3(h)]**

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(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(42). 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.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (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.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

#### B.20 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.

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**B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (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)]

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**B.22 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]**

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

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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
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**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 CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

**(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.****(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.****(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.****C.3 Opacity [326 IAC 5-1]**

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

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

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

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

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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]

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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]

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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]

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- (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]**

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- (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]**

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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)]**

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
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 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, 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).

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

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- (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]**

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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]**

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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]**

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- (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]**

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- (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]**

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- (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) 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**

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

**SECTION D.1****EMISSIONS UNIT OPERATION CONDITIONS****Emissions Unit Description:**

- (a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausting through stack S1A & B.  
  
The spray booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.
- (b) One (1) paint shop touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 bus per hour, and exhausting through S4.  
  
The touch up booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.
- (c) One (1) frame painting booth in building #9, approved for construction in 2008, identified as PB2, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray guns, wiping and dipping as methods of application, equipped with forty eight dry filters, and exhausting through stack S6.
- (d) One (1) undercoating paint booth in building #9, approved for construction in 2008, identified as PB3, with a maximum capacity of 0.65 vehicles per hour, utilizing airless spray guns, wiping and dipping as methods of application, equipped with a dry filter, and exhausting through stack S7;
- (e) One (1) terra glue operation, constructed in 1964, identified as P5, with a maximum capacity of 0.29 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.
- (f) One (1) turtle top glue operation, constructed in 1964, identified as P6, with a maximum capacity of 0.36 units per hour, utilizing air atomization equipped with dry filters for particulate control, aerosol cans, tube, wiping and caulking methods of application and exhausting inside the building.
- (i) One (1) assembly operation for specialty vehicles, identified as MPV, approved for construction in 2013, processing a maximum of 0.0236 vehicles per hour, using high volume low pressure (HPLV) application to apply adhesives, and aerosol cans and brushing, wiping or dabbing to apply other coatings and cleaners, with hand held baffles to control particulate matter overspray emissions from the air atomization spray coating and aerosol cans, exhausting inside the building.

(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 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]**

The total VOC usage at the paint shop operation - PB1, P4, PB2, PB3, terra glue operation - P5, turtle top glue operation - P6, and assembly operation - MPV, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 100 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 not applicable.

#### D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The total usage of any single hazardous air pollutant (HAP) at the paint shop operation - PB1, P4, PB2, PB3, terra glue operation - P5, turtle top glue operation - P6, and assembly operation - MPV shall be limited to less than 9.9 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The total usage of all hazardous air pollutants (HAPs) at the paint shop operation - PB1, P4, PB2, PB3, terra glue operation - P5, turtle top glue operation - P6, and assembly operation - MPV shall be limited to less than 24.9 tons per twelve (12) consecutive month period. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit single HAP, and combined HAPs from other emission units at the source, shall limit the single HAP and combined HAPs from the entire source to less than 10, and 25 tons per twelve (12) consecutive month period respectively, and render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 not applicable.

#### D.1.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating delivered to the applicator at the paint shop operation - PB1, P4, PB2 and PB3 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air dried coatings.

#### D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), the Permittee shall comply with the following work practices for the paint shop operation - PB1, P4, PB2 and PB3:

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

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

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

#### D.1.5 Particulate Control

Pursuant to 326 IAC 6-3-2(d), particulate from the paint shop operation- PB1, P4, PB2, PB3, and two (2) glue operations, P5 and P6 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

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

#### D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings only on days when one or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water.

This volume weighted average shall be determined by the following equation:

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

where: A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;

C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;

U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and

n is the number of coatings being averaged

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.1.3, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]****D.1.9 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S1 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 stack 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 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.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]****D.1.10 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and HAP emission limits established in Conditions D.1.1, and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount, and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The total VOC usage for each month;
  - (4) The total individual and combined HAP usage for each month;
  - (5) The weight of VOCs emitted for each compliance period; and
  - (6) The weight of total individual and combined HAPs emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC requirement and content limits established in Conditions D.1.3. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used;

- (2) The coating material and solvent less water used on daily basis;
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; and
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
  - (3) The volume weighted average VOC content of all the coatings used for metal surface coating within each of the paint booths PB1, P4, PB2 and PB3.
  - (4) The cleanup solvent usage for each day; and
  - (5) The total VOC usage for each day.
  - (6) If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limit contained in Condition D.1.3, then the Permittee shall not be required to maintain records identified in paragraphs (3), (4) and (5) above on that day;
- (c) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
  - (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.11 Reporting Requirements

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Quarterly summaries of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. 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 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****FACILITY OPERATION CONDITIONS****Facility Description [326 IAC 2-8-4(10)]:**

- (g) One (1) surface preparation operation consisting of polishing, buffing, surface grinding and sanding using handheld equipment in building #5, constructed in 2007, identified as SP, with a maximum capacity of 0.65 vehicle units per hour at a process weight rate of 3.38 tons per hour, equipped with two downdraft dry filters, C3 and C5 for particulate control, and exhausting through stacks S3 and S5.
- (h) Wood Working Operation with a combined process weight rate of 700 pounds of wood per hour (P2):
  - (1) One (1) woodworking operation, constructed in 1978, identified as P2, controlled by two cyclones, C-2A and C-2B, each with an airflow rate of less than 4,000 acfm, operating at a process weight rate of 700 pounds of wood per hour, and exhausting through stacks S2A and S2B, respectively
  - (2) One (1) table saw, constructed in 2008, identified as table saw, equipped with an integral fabric filter (UFO-101) with a flow rate of 1185 actual cubic feet per minute, and outlet grain loading of 0.016 dscf.
- (j) Woodworking operations including the following:
  - (1) One (1) mill room woodworking operation, identified as WW1, approved for construction in 2013, including one (1) band saw, one (1) table saw, one (1) chop saw, and one (1) belt sander, with a maximum wood throughput of 11.16 pounds per hour, with a dust collector for particulate control, exhausting inside the building.
  - (2) One (1) cabinet shop woodworking operation, identified as WW2, approved for construction in 2013, including one (1) table saw, one (1) chop saw, one (1) belt sander, one (1) routing table, one (1) pocket machine, and one (1) hinge table, with a maximum wood throughput of 3.17 pounds per hour, with a dust collector for particulate control, exhausting inside the building.

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

**Emission Limitations and Standards [326 IAC 2-8-4(1)]****D.2.1 Particulate [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from surface preparation operation, identified as SP, shall not exceed 9.27 pounds per hour when operating at a process weight rate of 3.38 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities (P2) shall not exceed 2.03 pounds per hour when operating at a process weight rate of 700 pounds per hour.

The pounds per hour limitation was calculated with the following equation for conditions (a) and (b):

Interpolation of the data for the process weight rate up to 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

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations (WW1 and WW2) shall each not exceed 0.55 pounds per hour when each operating at a process weight rate of less than 100 pounds per hour.

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventive Maintenance Plan is required for these facilities and any control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.2.3 Particulate Control

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- (a) In order to comply with condition D.2.1 (a), the dry filters for particulate control shall be in operation and control emissions from the surface prep facility at all times that the surface prep facility is in operation.
- (b) In order to comply with condition D.2.1 (b), the respective integral cyclones and integral fabric filters for particulate control shall be in operation and control emissions from the wood working facility at all times while the woodworking facility is in operation.
- (c) In order to comply with condition D.2.1 (c), the respective dust collectors for particulate control shall be in operation and control emissions from the woodworking operations at all times while the woodworking facility is in operation.

#### D.2.4 Manufacturer's Specifications

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The wood working operation, identified as P2, and their fabric filtration and cyclones integral to the system shall each operate per manufacturer's specifications.

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

#### D.2.5 Visible Emissions Notations

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- (a) Daily visible emission notations of wood working operation P2 and surface prep SP stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, 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.

#### D.2.6 Cyclone Failure Detection

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.2.7 Broken or Failed Dust Collector Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)]**

#### D.2.8 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the visible emission notations of the wood working operation P2 and surface prep SP stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**SECTION D.3****FACILITY OPERATION CONDITIONS****Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities**

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each;
  - (1) Twenty eight (28) space heaters, with a total heat input of 4.387 MMBtu per hour;
  - (2) Thirteen (13) natural gas-fired space heaters and air make-up units, constructed in 2007, with a total heat input capacity of 10.535 MMBtu per hour, exhausting outdoors;
  - (3) One (1) natural gas-fired space heater, constructed in 2008, identified as H46, with a maximum heat input capacity of 0.6563 MMBtu/hr, and exhausting indoors.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (d) Packaging lubricants and greases;
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (f) Cleaners and solvents characterized as having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20oC (68oF);
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5];
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2(e)];
  - (1) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs [326 IAC 2-7-1(21)(G)(ix)(AA)];
  - (2) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs [326 IAC 2-7-1(21)(G)(ix)(EE)];
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (j) Paved and unpaved roads and parking lots with public access;
- (k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

- (m) Filter or coalescer media changeout;
  - (n) Welding of specialty van and bus assembly components, equipped with two dust collectors GS-4 and GS-16 installed in 2008, and exhausting inside; and
  - (o) One (1) band saw operation, approved for construction in 2008, identified as band saw, to cross cut 1" x 1" and 1" x 2" 14 gauge steel tubing, with a capacity of 48 feet of 1" tubing cut per hour and 63 pounds per hour of raw material.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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## SECTION E.1

## OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) paint shop spray booth in building #5, constructed in 2007, identified as PB1, with a maximum capacity of 0.65 vehicles per hour, utilizing two (2) High Volume Low Pressure (HVLP) spray guns, wiping and dipping as methods of application, equipped with dry filters for particulate control, and exhausts through stack S1A & B;

The spray booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.

- (b) One (1) paint touch up booth in building #5, constructed in 2007, identified as P4, with a maximum capacity of 0.65 bus per hour, and exhausting through S4;

The touch up booth is an existing affected source under 40 CFR 63, Subpart HHHHHH.

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

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

#### E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.11174, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for paint shop spray booth (PB1) and paint touch up booth (P4) as specified in Appendix A of 40 CFR Part 63, Subpart HHHHHH in accordance with the schedule in 40 CFR 63 Subpart HHHHHH.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

#### E.1.2 National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH] [326 IAC 20-88]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment A of this permit), which are incorporated by reference as 326 IAC 20-88, except as otherwise specified in 40 CFR Part 63, Subpart HHHHHH, for paint shop spray booth (PB1) and paint touch up booth (P4):

- (1) 40 CFR 63.11169(c)
- (2) 40 CFR 63.11170
- (3) 40 CFR 63.11171(c)
- (4) 40 CFR 63.11172(b)
- (5) 40 CFR 63.11173(e), (f), and (g)
- (6) 40 CFR 63.11174
- (7) 40 CFR 63.11175
- (8) 40 CFR 63.11176
- (9) 40 CFR 63.11177(a), (b), (c), (d), and (g)
- (10) 40 CFR 63.11178

- (11) 40 CFR 63.11179
- (12) 40 CFR 63.11180
- (13) Table 1

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Independent Protection Company, Inc., Turtle Top Division

Source Address: 67819 State Road 15, New Paris, Indiana 46553

FESOP Permit No.: F 039-26868-00448

**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 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: Independent Protection Company, Inc., Turtle Top Division  
Source Address: 67819 State Road 15, New Paris, Indiana 46553  
FESOP Permit No.: F 039-26868-00448

**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"><li>• 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</li><li>• 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</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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 DATA SECTION

### FESOP Quarterly Report

Source Name: Independent Protection Company, Inc., Turtle Top Division

Source Address: 67819 State Road 15, New Paris, Indiana 46553

FESOP Permit No.: F 039-26868-00448

Facility: paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation - P5, turtle top glue operation - P6, and assembly operation - MPV

Parameter: VOC, single and combined HAPs usages

Limit: (a) total VOC usage at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation - P5, turtle top glue operation - P6, and assembly operation - MPV, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.0 tons per twelve (12) consecutive month period

(b) total usage of any single hazardous air pollutant (HAP) at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation - P5, turtle top glue operation - P6, and assembly operation - MPV, shall be limited to less than 9.9 tons per twelve (12) consecutive month period

(c) combined usage of all hazardous air pollutants (HAPs) at the paint shop spray booths - PB1, P4, PB2, PB3, terra glue operation - P5, turtle top glue operation - P6, and assembly operation - MPV, shall be limited to less than 24.9 tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	Total Input Usage This Month (tons)			Total Input Usage Previous 11 Months (tons)			Total 12-Month Input Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

\* List the single HAP with the greatest emission rate

☐ 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 DATA SECTION**  
**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**  
**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Independent Protection Company, Inc., Turtle Top Division

Source Address: 67819 State Road 15, New Paris, Indiana 46553

FESOP Permit No.: F 039-26868-00448

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**Permit Requirement** (specify permit condition #)**Date of Deviation:****Duration of Deviation:****Number of Deviations:****Probable Cause of Deviation:****Response Steps Taken:****Permit Requirement** (specify permit condition #)**Date of Deviation:****Duration of Deviation:****Number of Deviations:****Probable Cause of Deviation:****Response Steps Taken:**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Attachment A**

**40 CFR 63, Subpart HHHHHH**

**National Emission Standards for Hazardous Air Pollutants for Paint Stripping and  
Miscellaneous Surface Coating Operations at Area Sources**

**Independent Protection Company, Inc.  
67819 State Road 15  
New Paris, Indiana 46553**

**F039-26868-00448**

## **Title 40: Protection of Environment**

### **Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

**Source:** 73 FR 1759, Jan. 9, 2008, unless otherwise noted.

#### **What This Subpart Covers**

##### **§ 63.11169 What is the purpose of this subpart?**

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

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

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

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

(d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(2) Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

(3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.

(4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §63.11180.

(5) Surface coating or paint stripping that meets the definition of “quality control activities” in §63.11180.

(6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

**§ 63.11170 Am I subject to this subpart?**

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

**§ 63.11171 How do I know if my source is considered a new source or an existing source?**

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

(1) Mixing rooms and equipment;

(2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

(5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and

(6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.



(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in §63.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

### **General Compliance Requirements**

#### **§ 63.11172 When do I have to comply with this subpart?**

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

#### **§ 63.11173 What are my general requirements for complying with this subpart?**

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

(5) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

(1) A list of all current personnel by name and job description who are required to be trained;

(2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.

(i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(iii) Routine spray booth and filter maintenance, including filter selection and installation.

(iv) Environmental compliance with the requirements of this subpart.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[73 FR 1760, Jan. 9, 2008; 73 FR 8408, Feb. 13, 2008]

#### **§ 63.11174 What parts of the General Provisions apply to me?**

(a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

(b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

#### **Notifications, Reports, and Records**

##### **§ 63.11175 What notifications must I submit?**

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source,

you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

(2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

(3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;

(4) An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);

(5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

(i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

(ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

(6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g) of this subpart.

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g).

(3) The date of the Notification of Compliance Status.

(4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with §63.11173(b).

#### **§ 63.11176 What reports must I submit?**

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

#### **§ 63.11177 What records must I keep?**

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping

operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

(d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in §63.11173, §63.11174, §63.11175, or §63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

#### **§ 63.11178 In what form and for how long must I keep my records?**

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

#### **Other Requirements and Information**

#### **§ 63.11179 Who implements and enforces this subpart?**

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

#### **§ 63.11180 What definitions do I need to know?**

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR 63.2, and in this section as follows:

*Additive* means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

*Administrator* means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

*Aerospace vehicle or component* means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

*Airless and air-assisted airless spray* mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

*Appurtenance* means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

*Architectural coating* means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

*Cleaning material* means a solvent used to remove contaminants and other materials, such as dirt, grease, or oil, from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

*Coating* means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

(1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.

(2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.

(3) Adhesives, sealants, maskants, or caulking materials.



(4) Temporary protective coatings, lubricants, or surface preparation materials.

(5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

*Compliance date* means the date by which you must comply with this subpart.

*Deviation* means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

*Dry media blasting* means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

*Electrostatic application* means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

*Equipment cleaning* means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

*Facility maintenance* means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

*High-volume, low-pressure (HVLP) spray equipment* means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

*Initial startup* means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

*Materials that contain HAP or HAP-containing materials* mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

*Military munitions* means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard

personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

*Miscellaneous parts and/or products* means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

*Miscellaneous surface coating operation* means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

*Mobile equipment* means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

*Motor vehicle* means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

*Motor vehicle and mobile equipment surface coating* means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

*Non-HAP solvent* means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

*Paint stripping and/or miscellaneous surface coating source or facility* means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

*Paint stripping* means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

*Painter* means any person who spray applies coating.

*Plastic* refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

*Protective oil* means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

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

(1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.

(3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.

(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

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

(1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.

(2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

*Solvent* means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

*Space Vehicle* means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

*Spray-applied coating operations* means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

(1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

(2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

(3) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

*Surface preparation* or *Surface prep* means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

*Target HAP* are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

*Target HAP containing coating* means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

*Transfer efficiency* means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

*Truck bed liner coating* means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

**Table 1 to Subpart HHHHHH of Part 63—Applicability of General Provisions to Subpart HHHHHH of Part 63**

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart HHHHHH</b>	<b>Explanation</b>
§63.1(a)(1)–(12)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in §63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in §63.11180.
§63.3(a)–(c)	Units and Abbreviations	Yes	
§63.4(a)(1)–(5)	Prohibited Activities	Yes	
§63.4(b)–(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)–(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart HHHHHH</b>	<b>Explanation</b>
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)–(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(a)–(d)	Notification Requirements	Yes	§63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(h)	Notification of Compliance Status	No	§63.11175 specifies the dates and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	§63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §63.11177.
§63.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§63.10(b)(2)(xiv)	Records supporting notifications	Yes	

<b>Citation</b>	<b>Subject</b>	<b>Applicable to subpart HHHHHH</b>	<b>Explanation</b>
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.11176.
§63.10(d)(2)–(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14.
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§63.16(b)–(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

**Appendix A: Emissions Calculations  
Emission Summary**

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Company Name: Independent Protection Co., Inc  
Source Address: 67819 State Road 15, New Paris, IN  
Permit No.: 039-33680-00448  
Reviewer: Brian Wright

Category	Unlimited Potential Emissions (tons/year) (After Integral Woodworking Controls)												
	Existing Units								New Units				
	Pollutant	Paint Shop Spray Booths PB1, P4, PB2, PB3	Terra Glue P5	Turtle Top P6	Surface Preparation SP	Woodworking P2	Welding Operations	Natural Gas Combustion 42 Units	Band Saw	MPV	Woodworking	Natural Gas Combustion Units	TOTAL
Criteria Pollutants	PM	50.12	7.19	6.57	21.36	8.26	0.48	0.13	0.01	0.76	1.12	0.005	96.00
	PM10	50.12	7.19	6.57	21.36	8.26	0.48	0.51	0.01	0.76	1.12	0.02	96.40
	PM2.5	50.12	7.19	6.57	21.36	8.26	0.48	0.51	0.01	0.76	1.12	0.02	96.40
	SO2							0.04				0.002	0.04
	NOx							6.69				0.25	6.94
	VOC	30.34	60.15	63.56				0.37		2.31		0.01	156.74
	CO							5.62				0.21	5.83
	GHGs							8071				303	8,374
	Benzene							1.4E-04				5.3E-06	1.5E-04
Hazardous Air Pollutants	Cadmium							7.4E-05				2.8E-06	7.6E-05
	Chromium	3.08E-01					9.25E-04	9.4E-05				3.5E-06	0.3
	Cobalt						9.25E-04						9.3E-04
	Dichlorobenzene							8.0E-05				3.0E-06	8.3E-05
	Ethyl Benzene	0.36	0.25							0.02			0.6
	Formaldehyde							5.0E-03				1.9E-04	5.2E-03
	Glycol Ethers	1.24E+00	0.12	0.19				2.3E-04		0.01		8.5E-06	1.6
	Hexane		7.33	9.17				0.12		0.04		4.5E-03	16.7
	Lead							3.3E-05				1.3E-06	3.5E-05
	Manganese						2.94E-01	2.5E-05				9.5E-07	0.3
	Methanol		2.04							0.02			2.1
	MIBK	0.42	2.04										2.5
	Naphthalene	1.98E-02											0.02
	Nickel						9.25E-04	1.4E-04				5.3E-06	1.1E-03
	PCE									0.23			0.23
	Toluene		17.36	13.13				2.3E-04		0.16		8.5E-06	30.7
	Xylenes	1.78	2.12	4.97						0.03			8.9
	Totals	4.12	31.27	27.47	0.00	0.00	0.30	0.13	0.00	0.51	0.00	4.7E-03	63.79

Category	Limited Potential Emissions (tons/year)												
	Existing Units								New Units				TOTAL
	Pollutant	Paint Shop Spray Booths PB1, P4, PB2, PB3	Terra Glue P5	Turtle Top P6	Surface Preparation SP	Woodworking P2	Welding Operations	Natural Gas Combustion 42 Units	Band Saw	MPV	Woodworking	Natural Gas Combustion Units	
Criteria Pollutants	PM	50.12	7.19	6.57	21.36	8.89	0.48	0.13	0.01	0.76	1.12	0.005	96.63
	PM10	50.12	7.19	6.57	21.36	8.89	0.48	0.51	0.01	0.76	1.12	0.02	97.03
	PM2.5	50.12	7.19	6.57	21.36	8.89	0.48	0.51	0.01	0.76	1.12	0.02	97.03
	SO2							0.04				0.002	0.04
	NOx							6.69				0.25	6.94
	VOC	*	*	*				0.37		*		0.01	<99.38*
	CO							5.62				0.21	5.83
	GHGs							8071				303	8,374
	Hazardous Air Pollutants	Benzene							1.4E-04				5.3E-06
Cadmium								7.4E-05				2.8E-06	7.6E-05
Chromium		**					9.25E-04	9.4E-05				3.5E-06	<10**
Cobalt							9.25E-04						9.3E-04
Dichlorobenzene								8.0E-05				3.0E-06	8.3E-05
Ethyl Benzene		**	**							**			<10**
Formaldehyde								5.0E-03				1.9E-04	5.2E-03
Glycol Ethers		**	**	**				2.3E-04		**		8.5E-06	<10**
Hexane			**	**				0.12		**		4.5E-03	<10**
Lead								3.3E-05				1.3E-06	3.5E-05
Manganese							2.94E-01	2.5E-05				9.5E-07	0.29
Methanol		**	**							**			<10**
MIBK		**	**										<10**
Naphthalene		**											<10**
Nickel							9.25E-04	1.4E-04				5.3E-06	1.1E-03
PCE										**			<10**
Toluene			**	**	**				2.3E-04		**		8.5E-06
Xylenes	**	**	**	**					**			<10**	<10**
	Totals	**	**	**	0.00	0.00	0.30	0.13	0.00	**	0.00	4.7E-03	<25**

Category	Controlled Potential Emissions (tons/year)												
	Existing Units									New Units			TOTAL
	Pollutant	Paint Shop Spray Booths PB1, P4, PB2, PB3	Terra Glue P5	Turtle Top P6	Surface Preparation SP	Woodworking P2	Welding Operations	Natural Gas Combustion 42 Units	Band Saw	MPV	Woodworking	Natural Gas Combustion Units	
Criteria Pollutants	PM	3.56	0.14	0.13	0.43	8.26	0.05	0.13	0.01	0.76	1.12	0.005	14.59
	PM10	3.56	0.14	0.13	0.43	8.26	0.05	0.51	0.01	0.76	1.12	0.02	14.98
	PM2.5	3.56	0.14	0.13	0.43	8.26	0.05	0.51	0.01	0.76	1.12	0.02	14.98
	SO2							0.04				0.002	0.04
	NOx							6.69				0.25	6.94
	VOC	*	*	*				0.37		*		0.01	<99.38*
	CO							5.62				0.21	5.83
	GHGs							8071				303	8,374
Hazardous Air Pollutants	Benzene							1.4E-04				5.3E-06	1.5E-04
	Cadmium							7.4E-05				2.8E-06	7.6E-05
	Chromium	**					9.25E-04	9.4E-05				3.5E-06	<10**
	Cobalt						9.25E-04						9.3E-04
	Dichlorobenzene							8.0E-05				3.0E-06	8.3E-05
	Ethyl Benzene	**	**							**			<10**
	Formaldehyde							5.0E-03				1.9E-04	5.2E-03
	Glycol Ethers	**	**	**	**			2.3E-04		**		8.5E-06	<10**
	Hexane		**	**	**			0.12		**		4.5E-03	<10**
	Lead							3.3E-05				1.3E-06	3.5E-05
	Manganese						2.94E-01	2.5E-05				9.5E-07	0.29
	Methanol	**	**							**			<10**
	MIBK	**	**										<10**
	Naphthalene	**											<10**
	Nickel						9.25E-04	1.4E-04				5.3E-06	1.1E-03
	PCE									**			<10**
	Toluene		**	**	**			2.3E-04		**		8.5E-06	<10**
Xylenes	**	**	**	**					**			<10**	
	Totals	**	**	**	0.00	0.00	0.30	0.13	0.00	**	0.00	4.7E-03	<25**

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits

NOTES:

- \* Limited VOC emissions based on FESOP VOC limits contained in the permit
- \* Limited HAP emissions based on FESOP HAP limits contained in the permit



**Appendix A: Emissions Calculations  
Potential to Emit  
Modification**

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**Company Name: Independent Protection Co., Inc.  
Source Address: 67819 State Road 15, New Paris, IN  
Permit No.: 039-33680-00448  
Reviewer: Brian Wright**

**Uncontrolled Emissions**

<b>Emissions Unit</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>GHGs as CO2e</b>	<b>Total HAPs</b>	<b>Highest Single HAP</b>	<b>Highest Single HAP</b>
MPV	0.76	0.76	0.76	0.00	0.00	2.31	0.00	0.00	0.51	0.23	PCE
Natural Gas	0.00	0.02	0.02	0.00	0.25	0.01	0.21	303	0.00	0.00	
Woodworking*	1.12	1.12	1.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Change is PTE</b>	<b>1.88</b>	<b>1.90</b>	<b>1.90</b>	<b>0.00</b>	<b>0.25</b>	<b>2.33</b>	<b>0.21</b>	<b>303</b>	<b>0.51</b>	<b>0.23</b>	<b>PCE</b>

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

PCE = perchloroethylene or tetrachloroethylene, CAS No. 127-18-4.

**Appendix A: Emission Calculations**  
**Paint Booths PB1 and P4 - VOC, Particulates and HAPs**

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Company Name: Independent Protection Co., Inc.  
Source Address: 67819 State Road 15, New Paris, IN  
Permit No.: 039-33680-00448  
Reviewer: Brian Wright

**PB1 and P4- Particulates, VOC and HAPs**

Material	Product Code	Density (lbs/gal)	Weight % Water	Weight % Exempt	Weight % VOC	Weight % Solids	Maximum Capacity (unit/hr)	Maximum Capacity (gal/unit)	Maximum Usage (gals/hour)	VOC (lbs/gal)	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE PM/PM10 (lbs/hr)	PTE of PM/PM10 Before Controls (tons/year)	PTE of PM/PM10 After Controls (tons/year)	Transfer Efficiency* *
Ready Mix 3.5 M6466	381761	10.65	0.00%	0.00%	34.22%	65.78%	0.65	0.2781	0.1808	3.64	0.66	15.81	2.89	1.27	1.39	0.069	75%
Ready Mix 3.5 FLNA40703M6466	381762	10.62	0.00%	0.00%	34.09%	65.91%	0.65	0.5332	0.3466	3.62	1.25	30.11	5.49	2.43	2.66	0.133	75%
3.5 System A3.5 Activator	399093	8.74	0.00%	0.00%	38.93%	61.00%	0.65	0.2678	0.1741	3.40	0.59	14.22	2.59	0.93	1.02	0.051	75%
Autoclear HS & LV Clearcoat	390836	9.57	0.00%	49.70%	10.00%	40.30%	0.65	0.1010	0.0657	0.96	0.06	1.51	0.28	0.25	0.28	0.014	75%
Autoclear HS & LV Hardener	390837	10.55	0.00%	58.25%	0.00%	41.25%	0.65	0.0337	0.0219	0.00	0.00	0.00	0.00	0.10	0.10	0.005	75%
Activ LV Std Thinner	390838	9.49	0.00%	58.45%	28.72%	12.83%	0.65	0.0673	0.0437	2.73	0.12	2.86	0.52	0.05	0.06	0.003	75%
Autocoat BT 300 Binder Q10RV	391082	7.66	0.00%	0.00%	82.92%	17.13%	0.65	0.1723	0.1120	6.36	0.71	17.08	3.12	0.15	0.16	0.008	75%
Standard Hardener	387160	8.45	0.00%	0.00%	50.15%	49.70%	0.65	0.0172	0.0112	4.24	0.05	1.14	0.21	0.05	0.05	0.003	75%
High Performance Reducer	391064	7.35	0.00%	0.00%	100.00%	0.00%	0.65	0.0948	0.0616	7.35	0.45	10.87	1.98	0.00	0.00	0.000	75%
Colorbuild 2.1/2.8 Black Primer	382512	13.60	0.00%	30.53%	11.47%	58.00%	0.65	0.2214	0.1439	1.56	0.22	5.39	0.98	1.14	1.24	0.062	75%
Colorbuild 2.1/2.8 Hardener	384225	10.45	0.00%	62.18%	0.00%	37.82%	0.65	0.0554	0.0360	0.00	0.00	0.00	0.00	0.14	0.16	0.008	75%
2.1/2.8 Primer Sealer Activator	391203	9.97	0.00%	70.90%	28.23%	0.87%	0.65	0.0163	0.0106	2.82	0.03	0.72	0.13	0.00	0.00	0.000	75%
2.1/2.8 Primer Surf Activator	386258	10.29	0.00%	100.00%	0.00%	0.00%	0.65	0.0438	0.0285	0.00	0.00	0.00	0.00	0.00	0.00	0.000	75%
OTO Body Coat	315787	10.29	42.32%	0.00%	5.00%	52.32%	0.65	0.2100	0.1365	0.51	0.07	1.69	0.31	0.73	0.80	0.040	75%
<b>Totals</b>									<b>1.37</b>		<b>4.22</b>	<b>101.38</b>	<b>18.50</b>	<b>7.23</b>	<b>7.92</b>	<b>0.40</b>	

HAPs																	
Material	Product Code	Density (lbs/gal)	Maximum Capacity (gal/unit)	Maximum Usage (gals/hour)	Weight % MIBK	Weight % Xylene	Weight % Ethyl benzene	Weight % Glycol Ether	Weight % Naphthalene	Weight %Chromium Compounds	PTE of MIBK (tons/yr)	PTE of Xylene (tons/yr)	PTE of Ethylbenzene (tons/yr)	PTE of Glycol Ether (tons/yr)	PTE of Naphthalene (tons/yr)	PTE of Chromium (tons/yr)	Total PTE of HAPs
Ready Mix 3.5 M6466	381761	10.65	0.2781	0.1808	5.0%	5.0%	1.0%	0.0%	0.0%	0.0%	0.42	0.42	0.08	0.00	0.00	0.00	0.93
Ready Mix 3.5 FLNA40703M6466	381762	10.62	0.5332	0.3466	0.0%	5.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.81	0.16	0.00	0.00	0.00	0.97
3.5 System A3.5 Activator	399093	8.74	0.2678	0.1741	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Autoclear HS & LV Clearcoat	390836	9.57	0.1010	0.0657	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Autoclear HS & LV Hardener	390837	10.55	0.0337	0.0219	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Activ LV Std Thinner	390838	9.49	0.0673	0.0437	0.0%	0.0%	0.0%	18.0%	0.0%	0.0%	0.00	0.00	0.00	0.33	0.00	0.00	0.33
Autocoat BT 300 Binder Q10RV	391082	7.66	0.1723	0.1120	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Standard Hardener	387160	8.45	0.0172	0.0112	0.0%	25.0%	5.0%	0.0%	0.0%	0.0%	0.00	0.10	0.02	0.00	0.00	0.00	0.12
High Performance Reducer	391064	7.35	0.0948	0.0616	0.0%	0.0%	0.0%	25.0%	1.0%	0.0%	0.00	0.00	0.00	0.50	0.02	0.00	0.52
Colorbuild 2.1/2.8 Black Primer	382512	13.60	0.2214	0.1439	0.0%	5.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.43	0.09	0.00	0.00	0.00	0.51
Colorbuild 2.1/2.8 Hardener	384225	10.45	0.0554	0.0360	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2.1/2.8 Primer Sealer Activator	391203	9.97	0.0163	0.0106	0.0%	3.4%	0.7%	24.0%	0.0%	0.0%	0.00	0.02	0.00	0.11	0.00	0.00	0.13
2.1/2.8 Primer Surf Activator	386258	10.29	0.0438	0.0285	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
OTO Body Coat	315787	10.29	0.2100	0.1365	0.0%	0.0%	0.0%	5.0%	0.0%	5.0%	0.00	0.00	0.00	0.31	0.00	0.31	0.31
<b>Total PTE Of HAPs</b>											<b>0.422</b>	<b>1.775</b>	<b>0.355</b>	<b>1.242</b>	<b>0.020</b>	<b>0.308</b>	<b>3.814</b>

**NOTES:**

- Weight % Exempt is weight % of exempt non-photochemical reactive organic compounds.
- Weight % VOC is weight % of VOC less exempt in material. Note that VOC reported in Akzo Nobel MSDSs are VOC less exempt in coating per Akzo Nobel 7-8-08.
- Maximum Capacities as reported by source, based on historical production and actual coating materials used per unit.
- Product Code 390838 contains 58.45% by weight and 50% by volume exempt material per Akzo Nobel 7-8-08.
- Product Code 391203 contains 70.90% by weight and 63.02% by volume exempt material per Akzo Nobel 7-8-08.
- Dry filter control efficiency is 98% per filter manufacturer.
- There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

**METHODOLOGY**

Maximum Usage \*(gals/hour) = [Maximum Capacity (unit/hr)] x [Maximum Capacity (gal/unit)]  
VOC (lbs/gal) = [Density (lbs/gal)] x [Weight % VOC/100%]  
PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] \* [Weight % VOC/100%]  
PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] \* [24 hours/day]  
PTE of VOC (tons/yr) = [PTE of VOC (lbs/hr)] \* [(8760 hours/yr)] \* [1 ton/2000 lbs]  
PTE PM/PM10 (lbs/hr) = [Maximum Usage (gals/hour)] x [Weight % solids/100%]  
PTE of PM/PM10 Before Controls (tons/year) = [PTE PM/PM10 (lbs/hour)] x [8760 (hours/year)] x [1 ton/2000 lbs] x [1 - Transfer Efficiency %]  
PTE PM/PM10 After Controls (tons/yr) = [PTE of PM/PM10 (tons/yr)] x [1-(% control efficiency/100%)]  
HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] \* [Weight % HAP] \* [8760 hours/yr] \* [1 ton/2000 lbs]

**Appendix A: Emission Calculations**  
**VOC and Particulate**  
**VOC, Particulate and HAPs Emissions from Paint Booths PB2 and PB3**

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Company Name: Independent Protection Co., Inc.  
Source Address: 67819 State Road 15, New Paris, IN  
Permit No.: 039-33680-00448  
Reviewer: Brian Wright

**Physical Data for Coating Components as Supplied-PB2 and PB3**

Product Id		Ave. Gallons Per Vehicle	Density (lbs/gal)	% VOC by WT.	% Solids by WT.	%Solids by Vol.	VOC (lbs/gal)	Solids (lbs/gal)	Toluene % by WT.	Ethylbenzene % by WT.	Xylene % by WT.	MIBK % by WT.
	<b>Booth PB2</b>											
3-0855 PB	Frame Primer	2.760	9.34	13.38%	36.08%	31.73%	1.25	3.37	0.00%	0.00%	0.00%	0%
	<b>Booth PB3</b>											
Z Guard-9902S	Undercoating	7.097	10.43	0.96%	55.00%	45.00%	0.10	5.73	0.00%	0.00%	0.00%	0%

**Volatile Organic Compounds (VOC) , Particulate Matter (PM) and HAPs**

Paint Booths PB1 and P4 Emission Unit	Name	Primary surface coated	Paint used gal/hr	Transfer Efficiency	Uncontrolled PTE			Controlled PTE		PTE VOC lb/hr	PTE VOC lbs/day	PTE VOC tons/yr	Total HAP tons/yr	Toluene tons/yr	Ethyl benzene tons/yr	Xylene tons/yr	MIBK tons/yr
Metal surface coating sepecifically regulated by 326 IAC 8-2-9					PM/PM10 lbs/hr	PM tons/yr	PM-10 tons/yr	PM tons/yr	PM-10 tons/yr								
<b>Paint Booth PB2</b>																	
*PB2	Frame Primer	Steel frame	1.794	50%	3.02	13.24	13.24	0.26	0.26	2.242	53.82	9.82	0.000	0.000	0.000	0.000	0.000
<b>Paint Booth PB3</b>																	
**PB3	**Undercoating	Steel and wood	4.613	75%	6.61	28.96	28.96	2.90	2.90	0.461	11.07	2.02	0.000	0.000	0.000	0.000	0.000
	<b>Total</b>				<b>9.64</b>	<b>42.20</b>	<b>42.20</b>	<b>3.16</b>	<b>3.16</b>	<b>2.70</b>	<b>64.89</b>	<b>11.84</b>					
<b>Total HAPs</b>													<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**NOTES:**

1. Estimated emissions based upon a maximum of 0.65 vehicles per hour.
- 2.\* Manufacturer rated filter efficiency is 98%
3. \*\*Efficiency of controls in Undercoating is 90%
4. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

**METHODOLOGY**

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

**Appendix A: Emission Calculations**  
**P5 Terra Glue Operation - Adhesive Applied to Wood, carpeting, vinyl, metal**

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Company Name: Independent Protection Co., Inc.  
Source Address: 67819 State Road 15, New Paris, IN  
Permit No.: 039-33680-00448  
Reviewer: Brian Wright

**Terra Glue Operation P5- Particulates, VOC and HAPs**

ID Number	Coating Name	Ave. Gallons Per Vehicle	Density (lbs/gal)	% VOC by WT.	% Solids by WT.	%Solids by Vol.	VOC (lbs/gal)	Solids (lbs/gal)	Hexane % by Wt.	Toluene % by Wt.	Methanol % by Wt.	MIBK % by Wt.	Xylenes % by Wt.	Ethyl Benzene % by Wt.	Glycol Ethers % by Wt.
526-2	Tite Bond Wood Glue	1.516	8.84	21.30%	65.46%	66.00%	1.88	5.79	13.18%	8.12%	0.00%	0.00%	0.00%	0.00%	0.00%
BAS 2960	Danco Red Bulk Adhesive	3.992	6.67	46.70%	22.00%	14.10%	3.12	1.47	8.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Danco 2965C	Danco Clear Bulk Adhesive	3.105	6.88	39.20%	23.95%	20.60%	2.70	1.65	7.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%
ADPRO	Danco Aerosol Spray Adhesive	0.154	7.11	60.00%	11.00%	12.55%	4.27	0.78	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Primer 94	3M Cleaner	0.136	6.84	91.46%	0.00%	0.00%	6.26	0.00	0.00%	0.00%	0.00%	0.00%	35.00%	7.00%	0.00%
221	Sika Flex adhesive	1.406	10.26	4.00%	96.00%	94.41%	0.41	9.85	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00%
R. Williams	Lacquer Thinner	2.298	7.00	100.00%	0.00%	0.00%	7.00	0.00	0.00%	60.00%	10.00%	0.00%	0.00%	0.00%	0.00%
AO 420	Plexis Adhesive	4.022	8.01	5.21%	94.49%	93.63%	0.42	7.57	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Self leveling sealant	0.614	10.68	22.70%	77.30%	66.62%	2.42	8.25	0.00%	8.90%	0.00%	0.00%	0.00%	0.00%	0.00%
CX73-070	Pro 2000 Adhesive Sealant	0.307	8.34	55.00%	45.00%	37.51%	4.59	3.75	0.00%	0.00%	0.00%	0.00%	30.00%	5.00%	0.00%
	Champ Glass Cleaner	0.212	9.17	7.98%	0.00%	0.00%	0.73	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%
98-3	Black Enamel	0.175	7.51	60.00%	16.90%	31.66%	4.51	1.27	0.00%	15.92%	0.00%	0.00%	0.00%	0.00%	0.00%

ID Number	Coating Name	Gallons/ Hour	Transfer Efficiency	Application Method
526-2	Tite Bond Wood Glue	0.440	100%	Wiping
BAS 2960	Danco Red Bulk Adhesive	1.158	50%	HVLP Gun
Danco 2965C	Danco Clear Bulk Adhesive	0.900	50%	HVLP Gun
ADPRO	Danco Aerosol Spray Adhesive	0.045	50%	Aerosol Can
<b>Clean up operation</b>				
Primer 94	3M Cleaner	0.039	100%	Wiping
R. Williams	Lacquer Thinner	0.667	100%	Wiping
	Champ Glass Cleaner	0.061	100%	Wiping
<b>Metal coating</b>				
221	Sika Flex adhesive	0.408	100%	Wiping
AO 420	Plexis Adhesive	1.166	100%	Wiping
	Self leveling sealant	0.178	100%	Wiping
CX73-070	Pro 2000 Adhesive Sealant	0.089	100%	Wiping
98-3	Black Enamel	0.051	50%	Aerosol Can

**Volatile Organic Compounds (VOC) , Particulate Matter (PM) and HAPs**

Primary type surface Coated	Coating Name	Gallons/ Hour	PM lbs/hr	Uncontrolled PM tons/yr	PM-10 tons/yr	Controlled PM/PM10 tons/yr	VOC lb/hr	VOC lb/day	VOC tons/yr	Hexane tons/yr	Toluene tons/yr	Methanol tons/yr	MIBK tons/yr	Xylenes tons/yr	Ethyl Benzene tons/yr	Glycol Ethers tons/yr	HAP tons/yr
Wood-to-wood	Tite Bond Wood Glue	0.440	0.000	0.000	0.000	0.000	0.828	19.867	3.626	2.244	1.362	0.000	0.000	0.000	0.000	0.000	3.626
Wood to plastic	Danco Red Bulk Adhesive	1.158	0.850	3.721	3.721	0.074	3.607	86.570	15.799	2.977	0.000	0.000	0.000	0.000	0.000	0.000	2.977
Wood to plastic	Danco Clear Bulk Adhesive	0.900	0.742	3.249	3.249	0.065	2.428	58.280	10.636	1.899	2.713	0.000	0.000	0.000	0.000	0.000	4.613
Wood to rubber	Danco Aerosol Spray Adhesive	0.045	0.017	0.077	0.077	0.002	0.191	4.581	0.836	0.209	0.000	0.000	0.000	0.000	0.000	0.000	0.209
<b>Clean up operation</b>																	
Clean up	3M Cleaner	0.039	0.000	0.000	0.000	0.000	0.246	5.913	1.079	0.000	0.000	0.000	0.000	0.413	0.083	0.000	0.496
Clean wipe metal	Lacquer Thinner	0.667	0.000	0.000	0.000	0.000	4.666	111.977	20.436	0.000	12.262	2.044	2.044	0.000	0.000	0.000	16.349
Window cleaner	Champ Glass Cleaner	0.061	0.000	0.000	0.000	0.000	0.045	1.079	0.197	0.000	0.000	0.000	0.000	0.000	0.123	0.123	
<b>metal coating</b>																	
Steel to aluminum	Sika Flex adhesive	0.408	0.000	0.000	0.000	0.000	0.167	4.016	0.733	0.000	0.000	0.000	0.000	0.733	0.000	0.000	0.733
Metal fabric wood	Plexis Adhesive	1.166	0.000	0.000	0.000	0.000	0.486	11.667	2.129	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Caulk applied/metal	Self leveling sealant	0.178	0.000	0.000	0.000	0.000	0.431	10.348	1.889	0.000	0.740	0.000	0.000	0.000	0.000	0.000	0.740
Caulk applied/metal	Pro 2000 Adhesive Sealant	0.089	0.000	0.000	0.000	0.000	0.408	9.794	1.787	0.000	0.000	0.000	0.000	0.975	0.162	0.000	1.137
Touchup paint -metal	Black Enamel	0.051	0.032	0.141	0.141	0.003	0.228	5.473	0.999	0.000	0.265	0.000	0.000	0.000	0.000	0.000	0.265
<b>Total</b>	<b>PTE</b>		<b>1.641</b>	<b>7.19</b>	<b>7.19</b>	<b>0.14</b>			<b>60.15</b>								

**NOTES:**

- Emissions are based upon a maximum of 0.29 vehicles per hour.
- Manufacturer rated filter efficiency is 98%
- NOTE: Each work station on P5 has one spray gun for bulk adhesive . The quantities reported are the sum of all materials used in all workstations.
- There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

<b>Total HAPs</b>	<b>7.329</b>	<b>17.362</b>	<b>2.044</b>	<b>2.044</b>	<b>2.121</b>	<b>0.245</b>	<b>0.123</b>	<b>31.268</b>
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**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)  
HAP lbs/hr = (gallons/hr) x (lbs/gal) x (% HAP/100%)

**Appendix A: Emission Calculation:**  
**P6 Turtle Top Glue Operation-Adhesive Applied to Wood, carpeting, vinyl, met:**

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Company Name: Independent Protection Co., Inc  
Source Address: 67819 State Road 15, New Paris, IN  
Permit No.: 039-33680-00448  
Reviewer: Brian Wright

**Turtle Top Glue Operation P6- Particulates, VOC and HAPs**

Physical Data for Coating Components as Supplier	Ave. Gallons	Density	% VOC	% Solids	%Solids	VOC	Solids	Hexane	Toluene	Xylenes	Glycol
ID Number	Coating Name	Per Vehicle	(lbs/gal)	by WT.	by Vol.	(lbs/gal)	(lbs/gal)	% by Wt.	% by Wt.	% by Wt.	ethers
526-2	Tite Bond Wood Glue	0.330	8.84	21.30%	65.46%	66.00%	1.88	5.79	13.18%	8.12%	0.00%
BAS 2960	Danco Red Bulk Adhesive	1.065	6.67	46.70%	22.00%	14.10%	3.12	1.47	8.80%	0.00%	0.00%
Danco 2965C	Danco Clear Bulk Adhesive	0.355	6.88	39.23%	23.95%	20.60%	2.70	1.65	7.00%	10.00%	0.00%
ADPRO	Danco Aerosol Spray Adhesive	0.856	7.11	60.02%	11.00%	12.55%	4.27	0.78	15.00%	0.00%	0.00%
H00H012	Bender's #2 Solvent	0.323	7.26	100.00%	0.00%	0.00%	7.26	0.00	0.00%	100.00%	0.00%
226	Sika Cleaner	0.041	6.70	99.40%	0.00%	0.00%	6.66	0.00	0.00%	0.00%	0.00%
252	Sika Flex adhesive	2.532	10.01	5.48%	94.52%	92.53%	0.55	9.46	0.00%	0.00%	4.48%
AO 420	Plexis Adhesive	0.047	8.01	5.21%	94.49%	93.63%	0.42	7.57	0.00%	0.00%	0.00%
	WD40	0.194	6.81	50.76%	49.24%	26.00%	3.46	3.36	0.00%	0.00%	0.00%
	Champ Glass Cleaner	0.097	9.17	7.98%	0.00%	0.00%	0.73	0.00	0.00%	0.00%	5.00%
98-3	Black Enamel	0.145	7.51	60.00%	16.90%	31.66%	4.50	1.27	0.00%	15.92%	0.00%
1G2E010	Bender's Fabric Cleaner	0.131	10.01	41.47%	0.00%	0.00%	4.15	0.00	0.00%	0.00%	0.00%

ID Number	Coating Name	Gallons/ Hour	Transfer Efficiency	Application Method
526-2	Tite Bond Wood Glue	0.330	100%	Wiping
BAS 2960	Danco Red Bulk Adhesive	1.065	50%	HVLP Gun
Danco 2965C	Danco Clear Bulk Adhesive	0.355	50%	HVLP Gun
ADPRO	Danco Aerosol Spray Adhesive	0.856	50%	Aerosol Can
	<b>Clean up</b>			
H00H012	Bender's #2 Solvent	0.323	100%	Wiping
	WD40	0.194	100%	Wiping
	Champ Glass Cleaner	0.097	100%	Wiping
1G2E010	Bender's Fabric Cleaner	0.131	50%	Aerosol Can
	<b>metal coating</b>			
226	Sika Cleaner	0.041	100%	Wiping
252	Sika Flex adhesive	2.532	100%	Wiping
AO 420	Plexis Adhesive	0.047	100%	Wiping
98-3	Black Enamel	0.145	50%	Aerosol Can

**Volatile Organic Compounds (VOC) , Particulate Matter (PM) and HAP:**

Primary Typer of surface coated	Coating Name	Maximum usage gal/hr	Maximum Usage gal/day	PM/PM10 lbs/hr	Uncontrolled PM tons/yr	PM-10 tons/yr	Controlled PM/PM10 tons/yr	VOC lb/hr	VOC lb/day	VOC tons/yr	Hexane tons/yr	Toluene tons/yr	Xylenes tons/yr	Glycol Ethers tons/yr	Total HAP tons/yr
Wood to wood	Tite Bond Wood Glue	0.330	7.928	0.000	0.000	0.000	0.000	0.622	14.93	2.724	1.686	1.039	0.000	0.000	2.724
Wood to rubber	Danco Red Bulk Adhesive	1.065	25.548	0.781	3.422	3.422	0.068	3.317	79.60	14.528	2.738	0.000	0.000	0.000	2.738
wood-plastic-rug	Danco Clear Bulk Adhesive	0.355	8.516	0.292	1.280	1.280	0.026	0.958	22.98	4.194	0.748	1.069	0.000	0.000	1.818
wood-plastic-rug	Danco Aerosol Spray Adhesive	0.856	20.555	0.335	1.467	1.467	0.029	3.655	87.72	16.008	4.001	0.000	0.000	0.000	4.001
	<b>Clean up operation</b>														
Clean up	Bender's #2 Solvent	0.323	7.742	0.000	0.000	0.000	0.000	2.343	56.24	10.264	0.000	10.264	0.000	0.000	10.264
Clean rubber	WD40	0.194	4.645	0.000	0.000	0.000	0.000	0.669	16.07	2.932	0.000	0.000	0.000	0.000	0.000
Clean windows	Champ Glass Cleaner	0.097	2.323	0.000	0.000	0.000	0.000	0.071	1.70	0.310	0.000	0.000	0.000	0.194	0.000
Clean fabric	Bender's Fabric Cleaner	0.131	3.135	0.000	0.000	0.000	0.000	0.542	13.01	2.375	0.000	0.000	0.000	0.000	0.000
	<b>metal coating</b>														
Clean painted Aluminum	Sika Cleaner	0.041	0.982	0.000	0.000	0.000	0.000	0.272	6.54	1.193	0.000	0.000	0.000	0.000	0.000
Painted steel to aluminum	Sika Flex adhesive	2.532	60.760	0.000	0.000	0.000	0.000	1.388	33.32	6.081	0.000	0.000	0.000	0.000	4.972
Metal plastic...	Plexis Adhesive	0.047	1.119	0.000	0.000	0.000	0.000	0.019	0.47	0.085	0.000	0.000	0.000	0.000	0.000
Paint Aluminum	Black Enamel	0.145	3.484	0.092	0.403	0.403	0.008	0.654	15.69	2.863	0.000	0.760	0.000	0.000	0.760
<b>Total</b>	<b>PTE</b>				<b>6.573</b>	<b>6.573</b>	<b>0.131</b>			<b>63.559</b>					

**NOTES:**

- Emissions are based upon a maximum of 0.36 vehicles per hour.
- Each work station on P6 has one spray gun for bulk adhesive . The quantities reported are the sum of all materials used in all workstations.
- There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

**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)  
HAP tons/yr = (gallons/hr) x (lbs/gal) x (% HAP/100%) \* (8760hrs/yr)/(2000 lbs/ton)

<b>Total Haps</b>	<b>9.173</b>	<b>13.131</b>	<b>4.972</b>	<b>0.194</b>	<b>27.470</b>
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**Appendix A: Emissions Calculations**  
**Particulate**  
**Surface Prep operation (SP)**

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**Company Name: Independent Protection Co., Inc**  
**Source Address: 67819 State Road 15, New Paris, IN**  
**Permit No.: 039-33680-00448**  
**Reviewer: Brian Wright**

**Paint Shop, Surface Preparation (SP)\***

Product Id	Name	Gallons/ Hour	Transfer Efficiency	Density (lbs/gal)	Weight % Solids	Solids (lbs/gal)
381761	Ready Mix 3.5 M6466	0.1808	75%	10.65	65.78%	7.01
381762	Ready Mix 3.5 FLNA40703M6466	0.3466	75%	10.62	65.91%	7.00
399093	3.5 System A3.5 Activator	0.1741	75%	8.74	61.00%	5.33
390836	Autoclear HS & LV Clearcoat	0.0657	75%	9.57	40.30%	3.86
390837	Autoclear HS & LV Hardener	0.0219	75%	10.55	41.25%	4.35
390838	Activ LV Std Thinner	0.0437	75%	9.49	12.83%	1.22
391082	Autocoat BT 300 Binder Q10RV	0.1120	75%	7.66	17.13%	1.31
387160	Standard Hardener	0.0112	75%	8.45	49.70%	4.20
391064	High Performance Reducer	0.0616	75%	7.35	0.00%	0.00
382512	Colorbuild 2.1/2.8 Black Primer	0.1439	75%	13.60	58.00%	7.89
384225	Colorbuild 2.1/2.8 Hardener	0.0360	75%	10.45	37.82%	3.95
391203	2.1/2.8 Primer Sealer Activator	0.1060	75%	9.97	0.87%	0.09
386258	2.1/2.8 Primer Surf Activator	0.0285	75%	10.29	0.00%	0.00

Emission Unit	Name	Uncontrolled PTE				Controlled PTE			
		PM lb/hr	PM-10 lb/hr	PM ton/year	PM-10 ton/year	PM lb/hr	PM-10 lb/hr	PM ton/year	PM-10 ton/year
PB1 & P4	Ready Mix 3.5 M6466	0.950	0.950	4.161	4.161	0.0190	0.0190	0.083	0.083
PB1 & P4	Ready Mix 3.5 FLNA40703M6466	1.819	1.819	7.967	7.967	0.0364	0.0364	0.159	0.159
PB1 & P4	3.5 System A3.5 Activator	0.696	0.696	3.049	3.049	0.0139	0.0139	0.061	0.061
PB1 & P4	Autoclear HS & LV Clearcoat	0.190	0.190	0.833	0.833	0.0038	0.0038	0.017	0.017
PB1 & P4	Autoclear HS & LV Hardener	0.071	0.071	0.313	0.313	0.0014	0.0014	0.006	0.006
PB1 & P4	Activ LV Std Thinner	0.040	0.040	0.175	0.175	0.0008	0.0008	0.003	0.003
PB1 & P4	Autocoat BT 300 Binder Q10RV	0.110	0.110	0.483	0.483	0.0022	0.0022	0.010	0.010
PB1 & P4	Standard Hardener	0.035	0.035	0.154	0.154	0.0007	0.0007	0.003	0.003
PB1 & P4	High Performance Reducer	0.000	0.000	0.000	0.000	0.0000	0.0000	0.000	0.000
PB1 & P4	Colorbuild 2.1/2.8 Black Primer	0.851	0.851	3.729	3.729	0.0170	0.0170	0.075	0.075
PB1 & P4	Colorbuild 2.1/2.8 Hardener	0.107	0.107	0.467	0.467	0.0021	0.0021	0.009	0.009
PB1 & P4	2.1/2.8 Primer Sealer Activator	0.007	0.007	0.030	0.030	0.0001	0.0001	0.001	0.001
PB1 & P4	2.1/2.8 Primer Surf Activator	0.000	0.000	0.000	0.000	0.0000	0.0000	0.000	0.000
	<b>Total</b>	<b>4.88</b>	<b>4.88</b>	<b>21.36</b>	<b>21.36</b>	<b>0.098</b>	<b>0.098</b>	<b>0.427</b>	<b>0.427</b>

**NOTES:**

1. \*Emissions are conservatively estimated by assuming the maximum amount of material removed from the vehicles is equal to the amount of solids in surface coatings that are applied to the painted exterior surfaces of the vehicles. Coatings applied to frames and rocker panels and undercoating are not included, since no surface prep activities are associated with these areas.

2. Emissions are based upon a maximum of 0.65 vehicles per hour.  
Turtle Top processes vehicles through the surface prep and paint shop ranging in size from 3.2 to 12.1 tons. The average vehicle weight is 5.2 tons.  
At a process rate of 0.65 vehicles per hour the material process rate for surface prep ranges from 2.08 to 7.87 tons/hour and averages 3.38 tons/hour

3. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

**Methodology:**

Manufacturer rated filter efficiency = 98%

PM = PM10 lbs/hr = (gals/hr) x (lbs solids/gal) x (%Transfer Efficiency/100%)

PM = PM10 (after controls) tons/yr = [(lbs/hr) x ((100-%filter efficiency)/100)\* [(8760 hrs/yr)/[2000lbs/ton]

**Appendix A: Emission Calculations  
Woodworking Operation (P2)**

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**Company Name:** Independent Protection Co., Inc.  
**Source Address:** 67819 State Road 15, New Paris, IN  
**Permit No.:** 039-33680-00448  
**Reviewer:** Brian Wright

<b>PTE before Controls (tons/year)</b>					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (Square Feet) (ACFM)	Control Efficiency	Total (tons/yr) PTE
Woodworking-Cyclone	1	0.10	2200.0	90%	82.59
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					<b>82.59</b>
<b>*PTE after Controls (tons/year)</b>					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (Square Feet) (ACFM)	Control Efficiency	Total (tons/yr) PTE*
Woodworking-Cyclone	1	0.10	2200.0	90%	8.26
					<b>8.26</b>

**NOTES:**

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

2. There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

Methodology:

Potential (uncontrolled):

Emissions rate (PM) = PM after controls (ton/yr)/(1-control efficiency)

Potential (Integral control):

Emissions rate (PM) = Grain loading per actual cubic foot of air outlet (gr/cf)\*Air flow rate in actual cubic feet per minute\*60 minutes per hour/7000 grains per pound/2000pounds\*8760 hours per year.

**Appendix A: Emissions Calculations**  
**Welding and Thermal Cutting**

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**Company Name: Independent Protection Co., Inc.**  
**Source Address: 67819 State Road 15, New Paris, IN**  
**Permit No.: 039-33680-00448**  
**Reviewer: Brian Wright**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)					EMISSIONS (lb/hr)					TOTAL HAPS (lb/hr)
WELDING			PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Submerged Arc	0		0.036					0.000	0	0.000			0
Gas Metal Arc (MIG)(ER70S)	11	1.92	0.0052	0.00318	0.00001	0.00001	0.00001	0.110	0.0671616	0.000211	0.000211	0.0002112	0.068
Stick (E7018 electrode)			0.0211					0.000	0	0.000			0
Tungsten Inert Gas (TIG)(carbon steel)	0		0.0055					0.000	0	0.000			0
Oxyacetylene(carbon steel)	0		0.0055					0.000	0	0.000			0
								0.000	0	0.000			0

	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)					EMISSIONS (lbs/hr)					TOTAL HAPS (lb/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002			0.0002	0.000	0.000	0.000	0.000	0.000	0.000
Plasma	0	0	0						0.000	0.000	0.000	0.000	0.000	0.000

EMISSION TOTALS									PM = PM10	Mn	Ni	CO	Cr	Total HAPs
Potential Emissions lbs/hr									0.11	0.07	2.1E-04	2.1E-04	2.1E-04	6.8E-02
Potential Emissions lbs/day									2.64	1.61	0.01	0.01	0.01	1.62
Potential Emissions tons/year									0.48	0.29	9.3E-04	9.3E-04	9.3E-04	3.0E-01

PTE after controls tons/yr =	4.8E-02	2.9E-02	9.3E-05	9.3E-05	9.3E-05	3.0E-02
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SCC 3-09-052 Gas Metal Arc Welding - ER70S electrode type  
There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5  
Welding booth consists of Two dust collectors GS-4 and GS-14 to capture and control particulate emissions from welding operation.  
Capture efficiency = 90 % and control efficiency = 99% provided by source

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding PTE (lb/hr) = (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)  
PTE (before controls) tons /yr = [Welding PTE (lb/hr)] \* [(8760 hr/yr)/(2000 lbs/ton)]  
PTE (after controls) tons/yr = [PTE before controls tons/yr] x [(1-(% capture efficiency)/100%) + [(% capture efficiency)/100%] x [1-(% control efficiency)/100%]

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)  
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).  
Welding and other flame cutting emission factors are from an internal training session document.  
See AP-42, Chapter 12.19 for additional emission factors for welding.



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

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**Company Name:** Independent Protection Co., Inc.  
**Source Address:** 67819 State Road 15, New Paris, IN  
**Permit No.:** 039-33680-00448  
**Reviewer:** Brian Wright

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
Air Make-up Unit	2	2.000	4.000		
Space Heaters (H36-38)	3	0.125	0.375		
Air Make-up Units (H39)	1	1.500	1.500		
Air Make-up Heater FH1	1	2.700	2.700		
Space Heaters (H40-42)	3	0.120	0.360		
Space Heaters (H43-44)	2	0.170	0.340		
Space Heaters (H45)	1	1.250	1.250		
Space Heaters (28 units)	28	---	4.387		
Space Heater (H46)	1	0.6563	0.6563		
		<b>Total</b>	<b>15.568</b>	<b>1020</b>	<b>133.7</b>

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC
	1.9	7.6	7.6	0.6	100	5.5
					**see below	
Potential Emission in tons/yr	0.13	0.51	0.51	0.04	6.69	0.37

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

**HAPS Calculations**

HAPs - Organics						
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.4E-04	8.0E-05	5.0E-03	1.2E-01	2.3E-04	1.3E-01

HAPs - Metals						
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.3E-05	7.4E-05	9.4E-05	2.5E-05	1.4E-04	3.7E-04
						<b>Total HAPs</b>
						<b>Worst HAP</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Greenhouse Gas Calculations**

Greenhouse Gas			
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	8,022	0.2	0.1
Summed Potential Emissions in tons/yr	8,023		
CO2e Total in tons/yr	8,071		

**Methodology**

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

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

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

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

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

**Appendix A: Emissions Calculations**  
**Particulate**  
**Band saw operation**

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**Company Name: Independent Protection Co., Inc.**  
**Source Address: 67819 State Road 15, New Paris, IN**  
**Permit No.: 039-33680-00448**  
**Reviewer: Brian Wright**

Pollutant	Band Saw Capacity	Emission Factor*	PTE PM	PTE PM10
	inches/hr cut	lb/1000 "	tons/yr	tons/yr
PM	577	0.0039	0.0099	0.0099
PM10	577	0.0039	0.0099	0.0099

**EMISSION FACTORS:**

- \*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.
- Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick  
Machine Operations Sawing (general): Source Classification Code 3-09-030-05
- A cross cut band saw used to cut 1"x 1" and 1" x 2" 14-gauge (0.083 inch) steel tubing.
- There are no PM2.5 Emission Factors in AP-42, PM10 = PM2.5

**Methodology:**

PM/PM10 (lb/hr) = (max. inches cut/hour) x (emission factor)/(1000 inches)

PM/PM10 (tons/yr) = (lbs emissions/hour) x (8760 hrs/yr)/ (2000 lbs/ton)

**Appendix A: Emission Calculations  
MPV Surface Coatings**

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Company Name: Independent Protection Co., Inc  
Source Address: 67819 State Road 15, New Paris, IN  
Permit No.: 039-33680-00448  
Reviewer: Brian Wright

Coating Name	Coating Gallons Per Vehicle	Density (lbs/gal)	% VOC by WT.	% Solids by WT.	%Solids by Vol.	VOC (lbs/vehicle)	VOC (lbs/gal)	Solids (lbs/gal)	Hexane % by Wt.	Toluene % by Wt.	Methanol % by Wt.	PCE % by Wt.	Xylenes % by Wt.	Ethyl Benzene % by Wt.	Glycol Ethers % by Wt.
Loctite 5570 Adhesive	4.056	11.68	2.14%	97.86%	97.00%	1.01	0.25	11.43	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Spider Glue	5.510	6.82	34.89%	35.00%	27.00%	13.11	2.38	2.39	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Bender's #2 Solvent	0.051	7.26	100.00%	0.00%	0.00%	0.37	7.26	0.00	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%
ADPRO	0.390	7.11	54.90%	45.10%	20.00%	1.52	3.90	3.21	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Biodyne Cleaner/Degreaser	0.045	8.56	4.24%	20.00%	17.92%	0.02	0.36	1.71	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	16.67%
Beasolve Pearl	0.204	8.18	65.00%	35.00%	40.00%	1.09	5.32	2.86	0.00%	60.00%	10.00%	0.00%	0.00%	0.00%	0.00%
DegaSeal Sealant	0.097	8.17	32.14%	67.86%	63.81%	0.25	2.63	5.55	0.00%	0.00%	0.00%	0.00%	24.11%	8.04%	0.00%
Foaming Degreaser	0.051	8.48	5.70%	9.00%	7.45%	0.02	0.48	0.76	0.00%	8.90%	0.00%	0.00%	0.00%	0.00%	5.70%
Fabric Cleaner Spot Remover	0.321	13.69	69.60%	0.00%	0.00%	3.06	9.53	0.00	0.00%	0.00%	0.00%	49.60%	0.00%	0.00%	0.00%
Glass Cleaner	0.036	7.98	16.00%	0.00%	0.00%	0.05	1.28	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%
Bender's Undercoating	0.061	6.67	70.00%	30.00%	30.00%	0.29	4.67	2.00	0.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rust-Oleum Black Paint	0.443	6.28	58.50%	9.00%	30.70%	1.63	3.67	0.57	0.00%	0.00%	0.00%	0.00%	4.50%	4.50%	0.00%
Average VOC in Coating							1.99								

Coating Name	Gallons/ Hour	Transfer Efficiency	Application Method	Material Coated
Loctite 5570 Adhesive	0.096	100%	Wiping	Metal, Plastic, Wood, Fabric, Fiberglass
Spider Glue	0.130	50%	HVLP Gun	Wood and Fabric
Bender's #2 Solvent	0.001	100%	Clean HVLP Gun	Metal, Plastic, Fiberglass
ADPRO	0.009	50%	Aerosol Can	Plastic, Wood, Fabric, Fiberglass
Biodyne Cleaner/Degreaser	0.001	100%	Wiping	Metal, Plastic, Fiberglass
Beasolve Pearl	0.005	100%	Wiping	Metal, Plastic, Fiberglass
DegaSeal Sealant	0.002	100%	Wiping	Metal, Plastic, Fiberglass
Foaming Degreaser	0.001	100%	Wiping	Metal, Plastic, Fiberglass
Fabric Cleaner Spot Remover	0.008	50%	Aerosol Can	Fabric
Glass Cleaner	0.001	50%	Aerosol Can	Glass
Bender's Undercoating	0.001	100%	Aerosol Can	Metal, Plastic, Fiberglass
Rust-Oleum Black Paint	0.010	50%	Aerosol Can	Metal, Plastic, Fiberglass
	0.265			

**Potential Volatile Organic Compounds (VOC) , Particulate Matter (PM) and HAP:**

Coating Name	PM lbs/hr	PM tons/yr	PM10/PM2.5 tons/yr	VOC lb/hr	VOC lb/day	VOC tons/yr	Hexane tons/yr	Toluene tons/yr	Methanol tons/yr	PCE tons/yr	Xylenes tons/yr	Ethyl Benzene tons/yr	Glycol Ethers tons/yr	Total HAP tons/yr
Loctite 5570 Adhesive	0.000	0.000	0.000	0.024	0.573	0.105	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Spider Glue	0.155	0.679	0.679	0.309	7.415	1.353	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Bender's #2 Solvent	0.000	0.000	0.000	0.009	0.209	0.038	0.000	0.038	0.000	0.000	0.000	0.000	0.000	0.038
ADPRO	0.015	0.065	0.065	0.036	0.861	0.157	0.043	0.000	0.000	0.000	0.000	0.000	0.000	0.043
Biodyne Cleaner/Degreaser	0.000	0.000	0.000	0.000	0.009	0.002	0.000	0.000	0.000	0.000	0.000	0.000	0.007	0.007
Beasolve Pearl	0.000	0.000	0.000	0.026	0.614	0.112	0.000	0.103	0.017	0.000	0.000	0.000	0.000	0.121
DegaSeal Sealant	0.000	0.000	0.000	0.006	0.144	0.026	0.000	0.000	0.000	0.000	0.020	0.007	0.000	0.026
Foaming Degreaser	0.000	0.000	0.000	0.001	0.014	0.003	0.000	0.004	0.000	0.000	0.000	0.000	0.003	0.007
Fabric Cleaner Spot Remover	0.000	0.000	0.000	0.072	1.732	0.316	0.000	0.000	0.000	0.225	0.000	0.000	0.000	0.225
Glass Cleaner	0.000	0.000	0.000	0.001	0.026	0.005	0.000	0.000	0.000	0.000	0.000	0.000	0.001	0.001
Bender's Undercoating	0.000	0.000	0.000	0.007	0.162	0.030	0.000	0.013	0.000	0.000	0.000	0.000	0.000	0.013
Touchup paint -meta	0.003	0.013	0.013	0.038	0.920	0.168	0.000	0.000	0.000	0.000	0.013	0.013	0.000	0.026
<b>Total Potential Emissions</b>	<b>0.173</b>	<b>0.76</b>	<b>0.76</b>	<b>0.53</b>	<b>12.68</b>	<b>2.31</b>	<b>0.043</b>	<b>0.158</b>	<b>0.017</b>	<b>0.225</b>	<b>0.033</b>	<b>0.019</b>	<b>0.011</b>	<b>0.51</b>

**NOTES:**

- Emissions are based upon a maximum of 0.0236 vehicles per hour (49 vehicles per 2080 hours of operation)
- PM10 is assumed to equal PM.
- VOC reported is total volatile compounds less water and exempt organic compounds such as acetone
- PCE = perchloroethylene or tetrachloroethylene, CAS No. 127-18-4
- Coatings in aerosol cans are used for touch of finished vehicle

**METHODOLOGY**

VOC (lbs/vehicle) = gallons per vehicle x density (lbs/gallon) x % VOC by wt/100%

VOC (lbs/gallon) = density (lbs/gallon) x % VOC by wt/100%

Solids (lbs/gallon) = density (lbs/gallon) x % solids by wt/100%

Average VOC (lbs/gallon) = (sum of VOC lbs/vehicle) ÷ (sum of Coating gallons/vehicle)

PM (lbs/hr) = (gal/hour) \* (lbs/gal) x (% solids by wt/100%) x (1-%Transfer efficiency/100%)

PM (tons/yr) = PM (lbs/hr) X 8760 (hrs/yr) ÷ 2000 (lbs/ton)

VOC (lbs/hr) = (gal/hour) x (% VOC by wt/100%)

VOC (lbs/day) = VOC (lbs/hr) x 24 (hours/day)

VOC (tons/yr) = VOC (lbs/hr) x 8760 (hrs/yr) ÷ 2000 (lbs/ton)

HAP (tons/yr) = (gallons/hr) x density (lbs/gal) x (% HAP/100%) x 8760 (hrs/yr) ÷ 2000 (lbs/ton)

**Appendix A: Emissions Calculations  
Woodworking Operation EU-02**

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**Company Name:** Independent Protection Co., Inc.  
**Source Address:** 67819 State Road 15, New Paris, IN  
**Permit No.:** 039-33680-00448  
**Reviewer:** Brian Wright

	<b>WW1</b>	<b>WW2</b>
Outlet grain loading (ascf):	0.00787	0.00787
Airflow (acfm):	1,900	1900

**Controlled Emissions**

**PM/PM10/PM2.5 =** 0.26 lbs/hr  
**1.12 tons/yr**

**Uncontrolled Emissions**

Control Efficiency: 90%  
**PM/PM10/PM2.5 =** 2.56 lbs/hr  
**11.23 tons/yr**

**Methodology**

Controlled PM/PM10/PM2.5 lbs/hr = (outlet grain loading in ascf) \* (airflow in acfm) \* (60 min/hour) / (7000 grains/lb)  
Controlled PM/PM10/PM2.5 tons/yr = (PM/PM10/PM2.5 lbs/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

The particulate control equipment is considered to be integral to the process. Therefore, only the controlled potential emissions are used in calculating potential PM, PM10 and PM2.5 for the woodworking operation.

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

Page 14 of 14 TSD App A

**Company Name:** Independent Protection Co., Inc.  
**Source Address:** 67819 State Road 15, New Paris, IN  
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Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
Space Heater H47	1	0.060	0.060		
Space Heater H48	1	0.100	0.100		
Space Heater H49	1	0.125	0.125		
Space Heaters H50-H51	2	0.150	0.300		
<b>Total</b>		<b>0.585</b>		<b>1020</b>	<b>5.0</b>

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC
	1.9	7.6	7.6	0.6	100	5.5
					**see below	
Potential Emission in tons/yr	0.005	0.02	0.02	1.5E-03	0.25	0.01
						CO
						84

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

**HAPS Calculations**

HAPs - Organics						
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/Mcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	5.3E-06	3.0E-06	1.9E-04	4.5E-03	8.5E-06	<b>4.7E-03</b>

HAPs - Metals						
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/Mcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.3E-06	2.8E-06	3.5E-06	9.5E-07	5.3E-06	<b>1.4E-05</b>
					<b>Total HAPs</b>	<b>4.7E-03</b>
					<b>Worst HAP</b>	<b>4.5E-03</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Greenhouse Gas Calculations**

Greenhouse Gas			
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	301	5.8E-03	5.5E-03
Summed Potential Emissions in tons/yr	301		
CO2e Total in tons/yr	303		

**Methodology**

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

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

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

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

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



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

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

TO: Janet Kercher-Dudley  
Independent Protection Company, Inc.  
67819 State Road 15  
New Paris, IN 46553

DATE: November 14, 2013

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

SUBJECT: Final Decision  
First Administrative Amendment to FESOP  
039-33680-00448

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:  
Rob Cripe, Responsible Official  
Gregory Clark, GAI Consultants  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	PWAY 11/14/2013 Independent Protection Co. Inc. - Turtle Top Division 039-33680-00448 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		Janet Kercher - Dudley Independent Protection Co. Inc. - Turtle Top Divis 67819 SR 15 New Paris IN 46553 (Source CAATS)									
2		Rob Cripe VP Independent Protection Co. Inc. - Turtle Top Divis 67819 SR 15 New Paris IN 46553 (RO CAATS)									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
4		Mr. Gregory Clark GAI Consultants 1502 Magnavox Way Fort Wayne IN 46804 (Consultant)									
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
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