



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: February 4, 2014

RE: Henry Street, LLC / 081-33751-00070

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

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FN-REGIS.dot 6/13/2013



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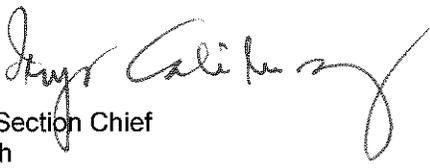
Michael R. Pence
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Commissioner

REGISTRATION OFFICE OF AIR QUALITY

**Henry Street, LLC
1001 Hurricane Street,
Franklin, IN 46131-1550**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

| | |
|---|--|
| Registration No. R081-33751-00070 | |
| Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality | Issuance Date: February 4, 2014 |

SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates an existing stationary source which surface coats steel beams.

| | |
|------------------------------|--|
| Source Address: | 1001 Hurricane Street, Franklin, IN 46131-1550 |
| General Source Phone Number: | 317-536-7405 |
| SIC Code: | 3479 (Metal Coating and Allied Services) |
| County Location: | Johnson |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Registration |

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) paint booth, identified as EU-1, constructed in 2011, using one airless spray gun with a maximum capacity to coat 132.78 linear feet of steel per hour. A fan, identified as CE-1, draws air from the paint booth through dry filters for control, exhausting to the outside through a stack, identified as S-1.
- (b) Three (3) MIG welding units, identified as W-1, W-2, and W-3, constructed in 2011, with a maximum consumption of 38.08 pounds of weld wire per hour, using no control, and exhausting to the indoors.
- (c) Two (2) natural gas-fired heaters for comfort heat, constructed in 2011, with a maximum heat input rate of 0.20 MMBtu/hour total, using no control and exhausting indoors.
- (d) Paved and unpaved roads.

SECTION B GENERAL CONDITIONS

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

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

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to Registration No. 081-33751-00070 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 registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

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

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

Indianapolis, IN 46204-2251

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

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant shall implement the PMPs.

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

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 registration:

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) paint booth, identified as EU-1, constructed in 2011, using one airless spray gun with a maximum capacity to coat 132.78 linear feet of steel per hour. A fan, identified as CE-1, draws air from the paint booth through dry filters for control, exhausting to the outside through a stack, identified as S-1.
- (b) Three (3) MIG welding units, identified as W-1, W-2, and W-3, constructed in 2011, with a maximum consumption of 38.08 pounds of weld wire per hour, using no control, and exhausting to the indoors.
- (c) Two (2) natural gas-fired heaters for comfort heat, constructed in 2011, with a maximum heat input rate of 0.20 MMBtu/hour total, using no control and exhausting indoors.
- (d) Paved and unpaved roads

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) paint booth, identified as EU-1, shall be controlled by a dry particulate filter, and the Registrant shall operate the control device in accordance with manufacturer's specifications.

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

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

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

- (b) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from the welding operations, identified as W-1, W-2 and W-3, shall not exceed 0.60 pounds per hour when the process weight rate is 114.24 pounds per hour.

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

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

Pursuant to 326 IAC 8-2-9(c)(2) (Miscellaneous Metal and Plastic Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator for the paint booth, identified as EU-1, shall be limited to 3.5 pounds of VOC per gallon of coating less water.

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

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

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

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC usage limitations contained in Condition D.1.2 and 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 325 IAC 8-1-4.

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

When using non-compliant coatings, compliance with the VOC content limit in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis for the paint booth, identified as EU-1.

The daily volume weighted average shall be determined by the following equation:

$$A = [\sum (c \times U) / \sum U]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Registrant shall maintain a record of any actions taken if overspray is visibly detected.
- (b) To document compliance with Condition D.1.2, the Registrant shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.2.

Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC emitted for each compliance period.
 - (5) The volume weighted average VOC content of the coatings used each day.
- (c) Section C - General Record Keeping Requirements contains the Registrant's obligations with regard to the records required by this condition.

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

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

| | |
|--------------------------|--------------------------------|
| Company Name: | Henry Street, LLC |
| Address: | 1001 Hurricane Street |
| City: | Franklin, IN 46131-1550 |
| Phone Number: | 317-536-7405 |
| Registration No.: | 081-33751-00070 |

I hereby certify that Henry Street, LLC is:

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. 081-33751-00070.
- not in compliance with the requirements of Registration No. 081-33751-00070.

I hereby certify that Henry Street, LLC is:

| |
|---------------------------------------|
| Authorized Individual (typed): |
| Title: |
| Signature: |
| Phone Number: |
| Date: |

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

| |
|-----------------------|
| Noncompliance: |
| |
| |
| |
| |

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

| |
|--|
| Source Description and Location |
|--|

| | |
|--------------------------|---|
| Source Name: | Henry Street LLC |
| Source Location: | 1001 Hurricane Street, Franklin, IN 46131-1550 |
| County: | Johnson |
| SIC Code: | 3479 (Metal Coating and Allied Services) |
| Registration No.: | R081-33751-00070 |
| Permit Reviewer: | Deborah Cole |

On October 3, 2013, the Office of Air Quality (OAQ) received an application from Henry Street, LLC related to the operation of an existing stationary source which surface coats steel beams.

| |
|---------------------------|
| Existing Approvals |
|---------------------------|

There have been no previous approvals issued to this source.

| |
|---------------------------------|
| County Attainment Status |
|---------------------------------|

The source is located in Johnson County.

| Pollutant | Designation |
|---|--|
| SO ₂ | Better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O ₃ | Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹ |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Cannot be classified or better than national standards. |
| Pb | Not designated. |
| ¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective federally July 11, 2013, for PM _{2.5} . | |

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Johnson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Johnson County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) **Other Criteria Pollutants**
Johnson County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Henry Street, LLC on October 3, 2013, relating to the continued operation of an existing source which surface coats steel beans.

The source consists of the following existing emission units:

- (a) One (1) paint booth, identified as EU-1, constructed in 2011, using one airless spray gun with a maximum capacity to coat 132.78 linear feet of steel per hour. A fan, identified as CE-1, draws air from the paint booth through dry filters for control, exhausting to the outside through a stack, identified as S-1.
- (b) Three (3) MIG welding units, identified as W-1, W-2, and W-3, constructed in 2011, with a maximum consumption of 38.08 pounds of weld wire per hour, using no control, and exhausting to the indoors.
- (c) Two (2) natural gas-fired heaters for comfort heat, constructed in 2011, with a maximum heat input rate of 0.20 MMBtu/hour total, using no control and exhausting indoors.
- (d) Paved and unpaved roads

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to obtaining a registration. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

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

| Process/ Emission Unit | Potential To Emit of the Entire Source (tons/year) | | | | | | | | | |
|-----------------------------------|--|-------------|-------------|-----------------|-----------------|--------------|-------------|-----------------------------|-------------|------------------|
| | PM | PM10* | PM2.5* | SO ₂ | NO _x | VOC | CO | GHGs as CO ₂ e** | Total HAPs | Worst Single HAP |
| Paint Booth | 0 | 0 | 0 | 0 | 0 | 24.68 | 0 | 0 | 1.12 | 1.05 (xylene) |
| Solvent | 0 | 0 | 0 | 0 | 0 | 0.08 | 0 | 0 | 0.07 | 0.07 (xylene) |
| Welding | 2.75 | 2.75 | 2.75 | 0 | 0 | 0 | 0 | 0 | 0.25 | 0.25 (manganese) |
| Natural Gas Combustion | 0.002 | 0.007 | 0.007 | 0.001 | 0.086 | 0.005 | 0.072 | 103.68 | 0.002 | 0.002 (Hexane) |
| Paved Roads | 0.01 | 0.001 | 0.000 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Unpaved Roads | 1.55 | 0.39 | 0.04 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total PTE of Entire Source | 4.31 | 3.15 | 2.80 | 0.00 | 0.09 | 24.76 | 0.07 | 103.69 | 1.44 | |
| Registration Levels** | < 25 | < 25 | < 25 | < 25 | < 25 | < 25 | < 100 | < 100,000 | < 25 | < 10 |

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

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of Volatile Organic Compounds (VOC) are within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the Standards of Performance for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source is not engaged in the surface coating of metal furniture.

- (b) The requirements of the Standards of Performance for Automobile and Light duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit since this source is not engaged in the surface coating automobiles or light duty trucks.
- (c) The requirements of the Standards of Performance for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since this source is not engaged in the surface coating of large appliances.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Furniture (40 CFR 63, Subpart RRRR), are not included in this permit because the source does not manufacture or coat metal furniture and the source is considered an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart RRRR do not apply.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM, are not included in this permit because the source is considered an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart MMMM do not apply.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X) are not included are not included in this permit because the SIC code assigned to this source is not one of the listed SIC codes subject to this rule.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR 63.11169, Subpart HHHHHH (6H) are not included for this registration because the source does not use any of the targeted HAPs.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

| |
|---|
| State Rule Applicability Determination |
|---|

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this Registration:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

Paint Booth (EU-1)

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

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) paint booth, identified as EU-1, shall be controlled by a dry particulate filter, and the Registrant shall operate the control device in accordance with manufacturer's specifications.

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

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

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

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

The paint booth, identified as EU-1, is not subject to the requirements of 326 IAC 8-1-6, because it is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations).

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

Pursuant to 326 IAC 8-2-1(a)(4), the paint booth, identified as EU-1, is subject to the requirements of 326 IAC 8-2-9 because construction commenced after July 1, 1990, the source will apply surface coating to metal parts under the Standard Industrial Classification Code of #34 (326 IAC 8-2-9(a)(1)(E)) and actual VOC emissions are greater than fifteen (15) pounds per day.

- (1) Pursuant to 326 IAC 8-2-9(c)(2), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of an VOC in excess of 3.5 pounds of coating, excluding water, delivered to a coating applicator in a coating application system that is air dried or forced air dried at temperatures up to 194 degrees Fahrenheit.
 - (a) Compliance with the VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)(7) 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.
 - (b) When using non-compliant coatings the daily volume weighted average of VOC content shall be calculated using the following methodology:

Where:

$$A = \frac{[\sum (C \times U)]}{\sum U}$$

- A = Daily volume weighted average in pounds VOC per gallon, as applied
C = As applied VOC content of coating in pounds VOC per gallon
U = Usage rate of coating in gallons per day

- (2) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
 - (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (e) Minimize VOC emissions from the cleaning 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.

Welding (W-1, W-2, W-3)

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

Pursuant to 326 IAC 6-3-1(9), welding processes that consume more than 625 pounds of rod or wire per day are subject to particulate emissions limitations.

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from the welding operations, identified as W-1, W-2 and W-3, shall not exceed 0.60 pounds per hour when the process weight rate is 114.24 pounds per hour.

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

(See Appendix A for calculations.)

Natural Gas Combustion Sources

- (a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired heaters are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.
- (b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired combustion units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.
- (c) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.
- (d) 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)
The natural gas-fired combustion units are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because they each have the potential to emit VOC of less than twenty-five (25) tons per year.
- (e) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired combustion units are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2.
- (f) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired combustion units are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 3, 2013; additional information was received from the source on December 3, 10, 11, and 2013.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 081-33751-00015. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed registration can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 ext.4-5377.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Appendix A: Emissions Calculations
Emissions Summary**

Company Name: Henry Street, Inc.
Source Address: 1001 Hurricane Street, Franklin, IN 46131
Permit Number: R047-33751-00015
Reviewer: Deborah cole

Potential Emissions Summary in tons per year

| Process/Emission Units | PM | PM10 | PM2.5 | SO₂ | NO_x | VOC | CO | GHG | Combined HAPs | Worst Single HAP | |
|-------------------------------|-------------|-------------|--------------|-----------------------|-----------------------|--------------|-------------|---------------|----------------------|-------------------------|-----------|
| Paint Booth | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 24.68 | 0.00 | 0.00 | 1.12 | 1.05 | Xylene |
| Solvent | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.08 | 0.00 | 0.00 | 0.07 | 0.07 | Xylene |
| Welding | 2.75 | 2.75 | 2.75 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.25 | 0.25 | Manganese |
| Natural Gas Combustion | 0.002 | 0.007 | 0.007 | 0.001 | 0.086 | 0.005 | 0.072 | 103.686 | 0.002 | 0.002 | Hexane |
| Paved Roads | 0.01 | 0.001 | 0.000 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Unpaved Roads | 1.55 | 0.39 | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| TOTALS | 4.31 | 3.15 | 2.80 | 0.00 | 0.09 | 24.76 | 0.07 | 103.69 | 1.44 | | |

Assume PM10 = PM2.5

Calculations based on 8,760 hours of operation per year.

**Appendix A: Emissions Calculations
Paintbooth**

**Company Name: Henry Street, LLC
Source Address: 1001 Hurricane St., Franklin, IN 46131
Permit Number: R047-33751-00015
Reviewer: Deborah Cole**

| Material | Density (Lb/Gal) | Gallons of Material (gal/linear ft steel) | Maximum (linear ft steel/hour) | Weight % V.M. &P Naphtha | Weight % Mineral Spirits 140-flash | Weight % Ethylbenzene | Weight % Xylene | Weight % Naphthalene | V.M. &P Naptha Emissions (ton/yr) | Mineral Spirits Emissions (ton/yr) | Ethylbenzene Emissions (ton/yr) | Xylene Emissions (ton/yr) | Naphthalene Emissions (tons/yr) |
|------------------------------|---------------------|--|--------------------------------------|------------------------------------|--|------------------------------|------------------------|-----------------------------|--|---|---|-------------------------------------|---|
| Quick Dry Enamel (F77E11) | 7.38 | 0.01098 | 132.784 | 45.00% | 5.00% | 1.00% | 8.00% | 0.10% | 21.20 | 2.36 | 0.03 | 1.05 | 0.05 |

"Worst Case" Individual HAP (tpy) 1.05

"Worst Case" Total HAPs (tpy) 1.12

Total VOCs (tpy) 24.68

METHODOLOGY

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

Gallons of paint per lineal feet of steel based on purchasing records for July-September 2013 and assumes 90% material usage.

**Appendix A: Emissions Calculations
Solvent Use**

**Company Name: Henry Street, LLC
Source Address: 1001 Hurricane St., Franklin, IN 46131
Permit Number: R047-33751-00015
Reviewer: Deborah Cole**

| Material | Density | Useage | % by Weight | | PTE (lbs/yr) | | PTE (tons/yr) | | PTE Total VOCs | |
|----------|----------|--------|-------------|--------------|--------------|--------------|---------------|--------------|----------------|---------|
| | (Lb/Gal) | | gal/yr | Ethylbenzene | Xylene | Ethylbenzene | Xylene | Ethylbenzene | Xylene | tons/yr |
| Xylene | 7.25 | 22.81 | 15% | 85% | 24.80 | 140.52 | 0.01 | 0.07 | 0.08 | |

Material use based on 1 cup per day.

| | | | | |
|------------|------|-------|--------|---------|
| | cups | pints | quarts | gallons |
| Daily use | 1 | 0.5 | 0.25 | 0.06 |
| | cups | pints | quarts | gallons |
| Yearly use | 365 | 182.5 | 91.25 | 22.81 |

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

Company Name: Henry Street, LLC
Source Address: 1001 Hurricane St., Franklin, IN 46131
Permit Number: R047-33751-00015
Reviewer: Deborah Cole

| PROCESS | Number of Stations | Max. electrode consumption per station (lbs/hr) | EMISSION FACTORS* (lb pollutant/lb electrode) | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
|-------------------------------------|--------------------|---|--|--------|----|----|-----------------------|-------|-------|------|------------------|
| | | | PM = PM10 | Mn | Ni | Cr | PM = PM10 | Mn | Ni | Cr | |
| WELDING | | | | | | | | | | | |
| Metal Inert Gas (MIG)(carbon steel) | 3 | 38.08 | 0.0055 | 0.0005 | | | 0.628 | 0.057 | 0.000 | 0 | 0.057 |
| EMISSION TOTALS | | | | | | | | | | | |
| Potential Emissions lbs/hr | | | | | | | 0.63 | 0.06 | 0.00 | 0.00 | 0.06 |
| Potential Emissions lbs/day | | | | | | | 15.08 | 1.37 | 0.00 | 0.00 | 1.37 |
| Potential Emissions tons/year | | | | | | | 2.75 | 0.25 | 0.00 | 0.00 | 0.25 |

Methodology:

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

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

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

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

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

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

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1/2000

326 IAC 6-3-2(e) Allowable Rate of Emissions

| Abrasive Blasting Booth | Process Rate (materials throughput) | Process Weight Rate | Allowable PM Emissions | Allowable PM Emissions |
|-------------------------|--|---------------------|------------------------|------------------------|
| | (lbs/hr) | (tons/hr) | (lbs/hr) | (tons/yr) |
| Welding | 114.24 | 0.06 | 0.60 | 2.64 |

Methodology

Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^{0.67}

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Henry Street, LLC
Source Address: 1001 Hurricane St., Franklin, IN 46131
Permit Number: R047-33751-00015
Reviewer: Deborah Cole

| | | |
|---------------------------------|-----------------------|---------------------------------|
| Heat Input Capacity MMBtu/hr | HHV mmBtu mmscf | Potential Throughput MMCF/yr |
| 0.2 | 1020 | 1.7 |

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-------------------------------|-----------|-------|---------------|-------|---------------------------|-------|-------|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx 100 **see below | VOC | CO |
| Potential Emission in tons/yr | 0.002 | 0.007 | 0.007 | 0.001 | 0.086 | 0.005 | 0.072 |

*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

| Emission Factor in lb/MMcf | HAPs - Organics | | | | | Total - Organics |
|-------------------------------|-----------------|-----------------|--------------|--------|---------|------------------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | |
| Potential Emission in tons/yr | 0.000 | 0.000 | 0.000 | 0.002 | 0.000 | 0.002 |

| Emission Factor in lb/MMcf | HAPs - Metals | | | | | Total - Metals |
|-------------------------------|---------------|---------|----------|-----------|--------|----------------|
| | Lead | Cadmium | Chromium | Manganese | Nickel | |
| Potential Emission in tons/yr | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| | |
|-------------------|------------------|
| Total HAPs | 1.621E-03 |
| Worst HAP | 2.100E-03 |

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

| Emission Factor in lb/MMcf | Greenhouse Gas | | |
|---------------------------------------|----------------|------|------|
| | CO2 | CH4 | N2O |
| Potential Emission in tons/yr | 103.06 | 0.00 | 0.00 |
| Summed Potential Emissions in tons/yr | 103.06 | | |
| CO2e Total in tons/yr | 103.69 | | |

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: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: Henry Street, Inc.
Source Address: 1001 Hurricane Street, Franklin, IN 46131
Permit Number: R047-33751-00015
Reviewer: Deborah cole

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

| Type | Maximum number of vehicles per day | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight Loaded (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|--|------------------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Vehicle (entering plant) (one-way trip) | 10.0 | 1.0 | 10.0 | 1.0 | 10.0 | 90 | 0.017 | 0.2 | 62.2 |
| Vehicle (leaving plant) (one-way trip) | 10.0 | 1.0 | 10.0 | 1.0 | 10.0 | 90 | 0.017 | 0.2 | 62.2 |
| Delivery trucks (entering plant) (one way) | 3.0 | 1.0 | 3.0 | 40.0 | 120.0 | 90 | 0.017 | 0.1 | 18.7 |
| Delivery trucks (leaving plant) (one way) | 3.0 | 1.0 | 3.0 | 40.0 | 120.0 | 90 | 0.017 | 0.1 | 18.7 |
| Totals | | | 26.0 | 40.0 | 260.0 | | | 0.4 | 161.8 |

Average Vehicle Weight Per Trip = 10.0 tons/trip
 Average Miles Per Trip = 0.02 miles/trip

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

| | PM | PM10 | PM2.5 | |
|-----------|-------|--------|---------|--|
| where k = | 0.011 | 0.0022 | 0.00054 | lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1) |
| W = | 10.0 | 10.0 | 10.0 | tons = average vehicle weight (provided by source) |
| sL = | 0.6 | 0.6 | 0.6 | g/m ² = ubiquitous baseline silt loading value for paved roads - Table 13.2.1-2 |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $E_f * [1 - (p/4N)]$
 where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

| | PM | PM10 | PM2.5 | |
|-----------------------------------|-------|-------|--------|---|
| Unmitigated Emission Factor, Ef = | 0.072 | 0.014 | 0.0036 | lb/mile |
| Mitigated Emission Factor, Eext = | 0.066 | 0.013 | 0.0032 | lb/mile |
| Dust Control Efficiency = | 0% | 0% | 0% | (pursuant to control measures outlined in fugitive dust control plan) |

| Process | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM10 (tons/yr) | Unmitigated PTE of PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10 (tons/yr) | Mitigated PTE of PM2.5 (tons/yr) | Controlled PTE of PM (tons/yr) | Controlled PTE of PM10 (tons/yr) | Controlled PTE of PM2.5 (tons/yr) |
|--|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|--------------------------------|----------------------------------|-----------------------------------|
| Vehicle (entering plant) (one-way trip) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Vehicle (leaving plant) (one-way trip) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Delivery trucks (entering plant) (one way) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Delivery trucks (leaving plant) (one way) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Totals | 0.01 | 0.00 | 0.000 | 0.005 | 0.001 | 0.000 | 0.01 | 0.00 | 0.00 |

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Henry Street, Inc.
Source Address: 1001 Hurricane Street, Franklin, IN 46131
Permit Number: R047-33751-00015
Reviewer: Deborah cole

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

| Type | Maximum number of vehicles | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight Loaded (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|--|----------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Personnel vehicles (entering plant) (one-way trip) | 10.0 | 1.0 | 10.0 | 1.0 | 10.0 | 590 | 0.112 | 1.1 | 407.9 |
| Personnel vehicles (leaving plant) (one-way trip) | 10.0 | 1.0 | 10.0 | 1.0 | 10.0 | 590 | 0.112 | 1.1 | 407.9 |
| Delivery trucks (entering plant) (one way) | 1.0 | 3.0 | 3.0 | 40.0 | 120.0 | 590 | 0.112 | 0.3 | 122.4 |
| Delivery trucks (leaving plant) (one way) | 1.0 | 3.0 | 3.0 | 40.0 | 120.0 | 590 | 0.112 | 0.3 | 122.4 |
| Totals | | | 26.0 | | 260.0 | | | 2.9 | 1,060.4 |

Average Vehicle Weight Per Trip = 10.0 tons/trip
 Average Miles Per Trip = 0.11 miles/trip

Unmitigated Emission Factor, Ef = $k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

| | PM | PM10 | PM2.5 | |
|-----------|------|------|-------|--|
| where k = | 4.9 | 1.5 | 0.15 | lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads) |
| s = | 4.8 | 4.8 | 4.8 | % = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant) |
| a = | 0.7 | 0.9 | 0.9 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |
| W = | 10.0 | 10.0 | 10.0 | tons = average vehicle weight (provided by source) |
| b = | 0.45 | 0.45 | 0.45 | = constant (AP-42 Table 13.2.2-2 for Industrial Roads) |

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

| | PM | PM10 | PM2.5 | |
|-----------------------------------|------|------|-------|---|
| Unmitigated Emission Factor, Ef = | 4.44 | 1.13 | 0.11 | lb/mile |
| Mitigated Emission Factor, Eext = | 2.92 | 0.74 | 0.07 | lb/mile |
| Dust Control Efficiency = | 0% | 0% | 0% | (pursuant to control measures outlined in fugitive dust control plan) |

| Process | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM10 (tons/yr) | Unmitigated PTE of PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10 (tons/yr) | Mitigated PTE of PM2.5 (tons/yr) | Controlled PTE of PM (tons/yr) | Controlled PTE of PM10 (tons/yr) | Controlled PTE of PM2.5 (tons/yr) |
|--|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|--------------------------------|----------------------------------|-----------------------------------|
| Vehicle (entering plant) (one-way trip) | 0.90 | 0.23 | 0.02 | 0.59 | 0.15 | 0.02 | 0.59 | 0.15 | 0.02 |
| Vehicle (leaving plant) (one-way trip) | 0.90 | 0.23 | 0.02 | 0.59 | 0.15 | 0.02 | 0.59 | 0.15 | 0.02 |
| Delivery trucks (entering plant) (one way) | 0.27 | 0.07 | 0.01 | 0.18 | 0.05 | 0.00 | 0.18 | 0.05 | 0.00 |
| Delivery trucks (leaving plant) (one way) | 0.27 | 0.07 | 0.01 | 0.18 | 0.05 | 0.00 | 0.18 | 0.05 | 0.00 |
| Totals | 2.35 | 0.60 | 0.06 | 1.55 | 0.39 | 0.04 | 1.55 | 0.39 | 0.04 |

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Gary Sells
Henry Street, LLC
1001 Hurricane Street
Franklin, IN 46131-1550

DATE: February 4, 2014

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

SUBJECT: Final Decision
Registration
081-33751-00070

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:
Christopher Bishop, Cardno ATC
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

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|----------------------------|---|---|---|--|
| IDEM Staff | VHAUN 2/4/2014 Henry Street LLC 081-33751-00070 FINAL | | Type of Mail: CERTIFICATE OF MAILING ONLY | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender |  | Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204 | | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|--|---------|--------------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1 | | Gary Sells Henry Street LLC 1001 Hurricane Street Franklin IN 46131-1550 (Source CAATS) | | Confirmed Delivery | | | | | | | | |
| 2 | | Johnson County Commissioners 5 East Jefferson Franklin IN 46131 (Local Official) | | | | | | | | | | |
| 3 | | Johnson County Health Department 86 W. Court St, Courthouse Annex Franklin IN 46131-2345 (Health Department) | | | | | | | | | | |
| 4 | | Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party) | | | | | | | | | | |
| 5 | | Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party) | | | | | | | | | | |
| 6 | | Mr. Christopher Bishop Cardno ATC 7988 Centerpoint Drive, Ste. 100 Indianapolis IN 46256 (Consultant) | | | | | | | | | | |
| 7 | | Greenwood City Council and Mayors Office 2 N. Madison Ave. Greenwood IN 46142 (Local Official) | | | | | | | | | | |
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
| 6 | | | |