



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: February 18, 2015

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

Source Name: Novae Corporation

Permit Level: FESOP - Transition from Registration

Permit Number: 069 - 35005 - 00066

Source Location: 1 Novae Parkway, Markle, Indiana

Type of Action Taken: Initial Permit

## **Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 35005.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

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

*(continues on next page)*

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

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

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

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

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



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

**Novae Corporation  
1 Novae Parkway  
Markle, Indiana 46770**

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

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

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

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

Operation Permit No.: F069-35005-00066	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 18, 2015 Expiration Date: February 18, 2020



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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)]

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The Permittee owns and operates a stationary trailer manufacturing plant.

Source Address:	1 Novae Parkway, Markle, Indiana 46770
General Source Phone Number:	(260) 758-9838
SIC Code:	3799
County Location:	Huntington
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)]

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

- (a) Building 1, consisting of the following:
  - (1) Powder Coating Line 1, constructed in 2004, and consisting of the following:
    - (A) One (1) natural gas fired hot water power wash station, identified as PWS 1, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.
    - (B) One (1) natural gas fired drying oven, with a maximum heat input capacity of 0.25 MMBtu/hr.
    - (C) One (1) powder coating booth, with a maximum coating usage of 8 pounds per unit and a maximum throughput rate of 8 parts per hour, controlled by cartridge filters, and exhausting indoors.
    - (D) One (1) natural gas fired curing oven, with a maximum heat input capacity of 2.5 MMBtu/hr.
  - (2) Wet Paint Coating Line 2, constructed in 2005, and consisting of the following:
    - (A) One (1) wet paint booth, identified as PB1, using HVLP spray guns, with a maximum throughput rate of 8 trailers per day, controlled by dry filters, and exhausting outside through stacks PB1 and PB2.
    - (B) One (1) natural gas fired hot water power wash station, identified as PWS 2, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.

- (b) Building 2, North operations consisting of the following:
- (1) One (1) shot blast room, identified as SBCN, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.
  - (2) One (1) power wash hot water heater, identified as PWHN, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.
  - (3) One (1) dry off oven, identified as DOOVN, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.
  - (4) One (1) powder coating booth, identified as PCBN, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.
  - (5) One (1) curing oven, identified as BKOVN, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.
- (c) Building 2, South operations consisting of the following:
- (1) One (1) shot blast room, identified as SBCS, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.
  - (2) One (1) power wash hot water heater, identified as PWHS, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.
  - (3) One (1) dry off oven, identified as DOOVS, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.
  - (4) One (1) powder coating booth, identified as PCBS, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.
  - (5) One (1) curing oven, identified as BKOVS, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.
- (d) Twenty-five (25) portable MIG welding stations, constructed in 2014, with a maximum electrode consumption rate of 12.5 pounds per hour, located throughout Building 1 and Building 2.

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, as defined in 326 IAC 2-7-1(21).

- (a) Paved and unpaved roads.

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

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

## **SECTION B GENERAL CONDITIONS**

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

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

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

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

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

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- (a) This permit, F069-35005-00066, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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.6 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.7 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.8 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.9 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.10 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.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

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

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

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

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

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

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- (a) All terms and conditions of permits established prior to F069-35005-00066 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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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)]

**B.18 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.19 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.20 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.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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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), 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.

(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]

---

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 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 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.9 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.10 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.11 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.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. 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.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.

The ERP 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) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 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.15 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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

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

**C.17 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.18 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.19 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) Building 1, consisting of the following:
  - (1) Powder Coating Line 1, constructed in 2004, and consisting of the following:
    - (C) One (1) powder coating booth, with a maximum coating usage of 8 pounds per unit and a maximum throughput rate of 8 parts per hour, controlled by cartridge filters, and exhausting indoors.
- (b) Building 2, North operations consisting of the following:
  - (4) One (1) powder coating booth, identified as PCBN, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.
- (c) Building 2, South operations consisting of the following:
  - (4) One (1) powder coating booth, identified as PCBS, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.

(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 FESOP and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall not exceed the following limits:

- (a) PM10 and PM2.5 emissions from the Powder Coating Booth (Building 1), shall not exceed 4.00 pounds per hour, each.
- (b) PM10 and PM2.5 emissions from the Powder Coating Booth North (Building 2), shall not exceed 3.13 pounds per hour, each.
- (c) PM10 and PM2.5 emissions from the Powder Coating Booth South (Building 2), shall not exceed 3.13 pounds per hour, each.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.1.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) PM emissions from the Powder Coating Booth (Building 1), shall not exceed 4.00 pounds per hour.
- (b) PM emissions from the Powder Coating Booth North (Building 2), shall not exceed 3.13 pounds per hour.
- (c) PM emissions from the Powder Coating Booth South (Building 2), shall not exceed 3.13 pounds per hour.

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than two-hundred fifty (250) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**D.1.3 Particulate [326 IAC 6-3-2(e)]**

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the powder coating operations shall comply with the following:

Emission Unit (ID)	Rate of Emission (lb/hr)	Process Weight Rate (ton/hr)
Building 1	1.54	0.232
Booth North - Building 2	16.82	8.225
Booth South - Building 2	16.82	8.225

The pound per hour limitation was calculated with the following equation:

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

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

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B -- Preventive Maintenance Plan contains the Permittee's obligation with regard to preventive maintenance plans.

**Compliance Determination Requirements**

**D.1.5 Particulate Control**

- (a) In order to ensure compliance with Conditions D.1.1 and D.1.2, the dust collector for PM, PM10, and PM2.5 control shall be in operation and control emissions from the Booth North – Building 2 and Booth South - Building 2 powder coating booths at all times the powder coating booths are in operation.
- (b) In order to ensure compliance with Conditions D.1.1, D.1.2, and D.1.3, the filter cartridge for PM, PM10, and PM2.5 control shall be in operation and control emissions from the Building 1 powder coating booth at all times the booth is in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### **D.1.6 Broken or Failed Cartridge or Filter**

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- (a) For a single compartment cartridge or filter 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 cartridge or filter 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, dust traces or triboflows.

#### **D.1.7 Baghouse Inspections**

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The Permittee shall perform quarterly inspections of the baghouses controlling particulate from the powder coating operations to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

#### **D.1.8 Record Keeping Requirement**

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- (a) To document the compliance status with Condition D.1.7 - Baghouse Inspections, the Permittee shall maintain records of the baghouses quarterly inspections.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) Building 2, North operations consisting of the following:
  - (1) One (1) shot blast room, identified as SBCN, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.
- (c) Building 2, South operations consisting of the following:
  - (1) One (1) shot blast room, identified as SBCS, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.

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

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

#### D.2.1 FESOP and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall not exceed the following limits:

- (a) PM10 and PM2.5 emissions from the (2) Shot Blasting units (identified as SBCN and SBCS), shall each not exceed 3.54 pounds per hour per unit.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.2.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) PM emissions from the (2) Shot Blasting units (identified as SBCN and SBCS), shall not exceed 3.54 pounds per hour per unit.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two-hundred fifty (250) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.2.3 Particulate [326 IAC 6-3-2(e)]

---

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the shot blasting operations shall comply with the following:

Emission Unit (ID)	Rate of Emission (lb/hr)	Process Weight Rate (ton/hr)
Shot Blast Unit North - Building 2	19.13	9.97
Shot Blast Unit South - Building 2	19.13	9.97

The pound per hour limitation was calculated with the following equation:

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

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

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

---

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B -- Preventive Maintenance Plan contains the Permittee's obligation with regard to preventive maintenance plans.

### Compliance Determination Requirements

#### D.2.5 Particulate Control

---

In order to ensure compliance with Conditions D.2.1 and D.2.2, the dust collector for PM, PM10, and PM2.5 control shall be in operation and control emissions from the two (2) shot blast units at all times the two (2) shot blast units are in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### Compliance Monitoring Requirements

#### D.2.6 Broken or Failed Bag Detection - Dust Collector

---

- (a) For a single compartment dust collector 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, dust traces or triboflows.

#### D.2.7 Baghouse Inspections

---

The Permittee shall perform quarterly inspections of the baghouses controlling particulate from the powder coating operations to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

#### D.2.8 Record Keeping Requirement

---

- (a) To document the compliance status with Condition D.2.7 - Baghouse Inspections, the Permittee shall maintain records of the baghouses quarterly inspections.
  
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Building 1, consisting of the following:
  - (2) Wet Paint Coating Line 2, constructed in 2005, and consisting of the following:
    - (A) One (1) wet paint booth, identified as PB1, using HVLP spray guns, with a maximum throughput rate of 8 trailers per day, controlled by dry filters, and exhausting outside through stacks PB1 and PB2.

(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.3.1 Particulate [326 IAC 6-3-2(d)]

---

Pursuant to 326 IAC 6-3-2(d), particulate from PB1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.3.2 Volatile Organic Compounds [326 IAC 8-2-9]

---

- (a) Pursuant to 326 IAC 8-2-9(c)(1), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of four and three-tenths (4.3) pounds of VOC per gallon of coating, excluding water, as delivered to a coating applicator that applies clear coatings.
- (b) Pursuant to 326 IAC 8-2-9(c)(2), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five tenths (3.5) pounds of VOC per gallon of coating, excluding water, for non-clear coat coatings, as delivered to the applicator.
- (c) 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:
  - (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (2) 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.
  - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (5) 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.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

---

A Preventive Maintenance Plan is required for this facility and its control device. 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.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

---

Compliance with the VOC content contained in Condition D.3.2 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 in 326 IAC 8-1-4.

### D.3.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

---

When using non-compliant coatings, compliance with the VOC content contained in Condition D.3.2, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a daily volume weighted average of coatings on daily basis.

The 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.

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

### D.3.6 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 PB1 stack while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response 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 a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

### D.3.7 Record Keeping Requirement

---

- (a) To document the compliance status with Conditions D.3.2, the Permittee shall maintain

records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.3.2.

- (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on daily basis for each booth.
    - (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 solvent.
  - (3) The daily cleanup solvent usage; and
  - (4) The total VOC usage for each day.
  - (5) The dates and times when non-compliant coatings are used and at what booth the non-compliant coatings are used.
  - (6) During periods when non-compliant coatings are used:
    - (A) The volume weighted average VOC content of the coatings used for each day.
- (b) To document the compliance status with Condition D.3.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

## SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Building 1, consisting of the following:
  - (1) Powder Coating Line 1, constructed in 2004, and consisting of the following:
    - (A) One (1) natural gas fired hot water power wash station, identified as PWS 1, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.
  - (2) Wet Paint Coating Line 2, constructed in 2005, and consisting of the following:
    - (B) One (1) natural gas fired hot water power wash station, identified as PWS 2, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.
- (b) Building 2, North operations consisting of the following:
  - (2) One (1) power wash hot water heater, identified as PWHN, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.
- (c) Building 2, South operations consisting of the following:
  - (2) One (1) power wash hot water heater, identified as PWHS, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.

(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.4.1 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each hot water power wash station and each hot water heater shall be limited to 0.6 pounds per MMBtu heat input.

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

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

Source Name: Novae Corporation  
Source Address: 1 Novae Parkway, Markle, Indiana 46770  
FESOP Permit No.: F069-35005-00066

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Novae Corporation  
Source Address: 1 Novae Parkway, Markle, Indiana 46770  
FESOP Permit No.: F069-35005-00066

**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 AND ENFORCEMENT BRANCH  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Novae Corporation  
 Source Address: 1 Novae Parkway, Markle, Indiana 46770  
 FESOP Permit No.: F069-35005-00066

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

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

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

Novae Corporation  
1 Novae Parkway  
Markle, Indiana 46770

### Affidavit of Construction

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

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_  
(Company Name)
4. I hereby certify that Novae Corporation 1 Novae Parkway, Markle, Indiana 46770, has constructed and will operate a trailer manufacturing plant in conformity with the requirements and intent of the permit application received by the Office of Air Quality on October 2, 2014, and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F069-35005-00066, Plant ID No. 069-00066 issued on \_\_\_\_\_.

Further Affiant said not.

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

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

Technical Support Document (TSD) for a Registration Transitioning to a  
Federally Enforceable State Operating Permit (FESOP)  
with New Source Review (NSR)

**Source Description and Location**

**Source Name:** Novae Corporation  
**Source Location:** 1 Novae Parkway, Markle, Indiana 46770  
**County:** Huntington  
**SIC Code:** 3799 (Transportation Equipment, Not Elsewhere Classified)  
**Operation Permit No.:** F 069-35005-00066  
**Permit Reviewer:** Joshua Levering

On October 2, 2014, the Office of Air Quality (OAQ) received an application from Novae Corporation related to the construction and operation of new emission units and the continued operation of an existing stationary trailer manufacturing plant.

**Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration No. 069-19249-00066, issued on August 4, 2004, and
- (b) Registration Revision No. 069-20107-00066, issued on February 2, 2005.

Due to this application, the source is transitioning from a Registration to a FESOP.

**County Attainment Status**

The source is located in Huntington County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are

considered when evaluating the rule applicability relating to ozone. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) PM<sub>2.5</sub>  
Huntington County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Other Criteria Pollutants  
Huntington County has been classified as attainment or unclassifiable in Indiana for list the pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

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

### Background and Description of Permitted Emission Units and New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Novae Corporation on October 2, 2014, relating to the construction of a new production building. The building will contain two identical trailer production lines, identified as a North and a South line. Both lines will contain shot blast units, power wash booths, dry off ovens, powder coating booths, and cure ovens. The source is transitioning from a Registration to a FESOP because the construction and operation of this new equipment will result in potential to emit for particulate matter to exceed Registration and MSOP thresholds.

The source consists of the following permitted emission units:

- (a) Building 1, consisting of the following:
  - (1) Powder Coating Line 1, constructed in 2004, and consisting of the following:
    - (A) One (1) natural gas fired hot water power wash station, identified as PWS 1, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.
    - (B) One (1) natural gas fired drying oven, with a maximum heat input capacity of 0.25 MMBtu/hr.
    - (C) One (1) powder coating booth, with a maximum coating usage of 8 pounds per unit and a maximum throughput rate of 8 parts per hour, controlled by cartridge filters, and exhausting indoors.
    - (D) One (1) natural gas fired curing oven, with a maximum heat input capacity of 2.5 MMBtu/hr.
  - (2) Wet Paint Coating Line 2, constructed in 2005, and consisting of the following:
    - (A) One (1) wet paint booth, identified as PB1, using HVLP spray guns, with a maximum throughput rate of 8 trailers per day, controlled by dry filters, and exhausting outside through stacks PB1 and PB2.

- (B) One (1) natural gas fired hot water power wash station, identified as PWS 2, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.

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

- (b) Building 2, North operations consisting of the following:
  - (1) One (1) shot blast room, identified as SBCN, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.
  - (2) One (1) power wash hot water heater, identified as PWHN, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.
  - (3) One (1) dry off oven, identified as DOOVN, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.
  - (4) One (1) powder coating booth, identified as PCBN, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.
  - (5) One (1) curing oven, identified as BKOVN, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.
- (c) Building 2, South operations consisting of the following:
  - (1) One (1) shot blast room, identified as SBCS, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.
  - (2) One (1) power wash hot water heater, identified as PWHS, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.
  - (3) One (1) dry off oven, identified as DOOVS, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.
  - (4) One (1) powder coating booth, identified as PCBS, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.
  - (5) One (1) curing oven, identified as BKOVVS, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.
- (d) Twenty-five (25) portable MIG welding stations, constructed in 2014, with a maximum electrode consumption rate of 12.5 pounds per hour, located throughout Building 1 and Building 2.

Insignificant activities consisting of the following:

- (a) Paved and unpaved roads.

**Enforcement Issues**

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

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP**

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.

Pollutant	Potential To Emit (tons/year)
PM	318.82
PM10 <sup>(1)</sup>	302.12
PM2.5 <sup>(1)</sup>	302.12
SO <sub>2</sub>	0.07
NO <sub>x</sub>	11.70
VOC	13.81
CO	9.83

(1) 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) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
<b>TOTAL HAPs</b>	<b>3.71</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM, PM10, and PM2.5 are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) 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).

**PTE of the Entire Source After Issuance of the FESOP**

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Powder Coating (Building 1 and 2)	44.94	44.94	44.94	-	-	-	-	-	-
Shot Blasting	31.01	31.01	31.01	-	-	-	-	-	-
Wet Paint Booth	0.37	0.37	0.37	-	-	13.17	-	2.81	1.88 MIBK
Welding	7.53	7.53	7.53	-	-	-	-	0.68	0.68 Manganese
Natural Gas Combustion	0.22	0.89	0.89	0.07	11.70	0.64	9.83	0.22	0.21 Hexane
<b>Total PTE of Entire Source</b>	<b>84.07</b>	<b>84.74</b>	<b>84.74</b>	<b>0.07</b>	<b>11.70</b>	<b>13.81</b>	<b>9.83</b>	<b>3.71</b>	-
<i>Paved &amp; Unpaved Roads (Fugitive Emissions)</i>	<i>2.24</i>	<i>0.55</i>	<i>0.06</i>	-	-	-	-	-	-
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	NA
negl. = negligible *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".									

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

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

(1) Criteria Pollutants - PM10 and PM2.5

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

- (A) PM10 and PM2.5 emissions from the Powder Coating Booth (Building 1), shall not exceed 4.00 pounds per hour, each.
- (B) PM10 and PM2.5 emissions from the Powder Coating Booth North (Building 2), shall not exceed 3.13 pounds per hour, each.
- (C) PM10 and PM2.5 emissions from the Powder Coating Booth South (Building 2), shall not exceed 3.13 pounds per hour, each.
- (D) PM10 and PM2.5 emissions from the (2) Shot Blasting units (identified as SBCN and SBCS), shall each not exceed 3.54 pounds per hour per unit.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:

- (1) The potential to emit PM, PM10, and PM2.5 is limited to less than 250 tons per year,
- (2) The potential to emit all other PSD regulated pollutants are less than 250 tons per year,
- (3) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1), and

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (A) PM10 and PM2.5 emissions from the Powder Coating Booth (Building 1), shall not exceed 4.00 pounds per hour, each.
- (B) PM10 and PM2.5 emissions from the Powder Coating Booth North (Building 2), shall each not exceed 3.13 pounds per hour, each.
- (C) PM10 and PM2.5 emissions from the Powder Coating Booth South (Building 2), shall each not exceed 3.13 pounds per hour, each.
- (D) PM10 and PM2.5 emissions from the (2) Shot Blasting units (identified as SBCN and SBCS), shall each not exceed 3.54 pounds per hour per unit.
- (E) PM emissions from the Powder Coating Booth (Building 1), shall not exceed 4.00 pounds per hour.
- (F) PM emissions from the Powder Coating Booth North (Building 2), shall not exceed 3.13 pounds per hour.
- (G) PM emissions from the Powder Coating Booth South (Building 2), shall not exceed 3.13 pounds per hour.
- (H) PM emissions from the (2) Shot Blasting units (identified as SBCN and SBCS), shall not exceed 3.54 pounds per hour per unit.

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) GHGs

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of

a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

### **Federal Rule Applicability Determination**

#### New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in this permit, since this source does not perform surface coating on automobiles or light duty trucks as defined in 40 CFR 60.391.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6), are not included in this permit, since the solvent used in the spray gun cleaning operations does not contain any regulated halogenated solvents.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in this permit, since the source is an area source.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95), are not included in this permit, since the source is an area source.
- (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, are not included in this permit, since the source does not perform any of the following: paint stripping operations of any kind; auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations; or spray application of coatings containing a targeted HAPs to any part or product made of metal or plastic or combination of metal and plastic. Chassis are not considered mobile equipment because the definition of *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.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJJ, are not included in this permit, since the hot water heaters and hot water power wash stations are all gas-fired boilers as indicated, and therefore, pursuant to 40 CFR 63.11195(e) are not subject to the NESHAP.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11514, Subpart XXXXXX, are not included in this permit, since the source is not primarily engaged in the operations listed as one of the nine source categories for this subpart.

- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.

Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 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.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 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.
- (g) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

**State Rule Applicability Determination - Individual Facilities**

Powder Coating Operations

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the powder coating operations shall comply with the following:

Emission Unit (ID)	Rate of Emission (lb/hr)	Process Weight Rate (ton/hr)
Building One	1.54	0.232
Booth North - Building 2	16.82	8.225
Booth South - Building 2	16.82	8.225

NOTE: The process weight rate used for the Rate of Emission (lb/hr) limitation for Booth North – Building 2 and Booth South – Building 2 is based on coating a maximum of two (2) trailers per booth per hour at 8,200 pounds per trailer.

The pound per hour limitation was calculated with the following equation:

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

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

Based on calculations, the cartridge filter for Building One is needed to comply with these limits.

Shot Blasting Operations

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the shot blasting operations shall comply with the following:

Emission Unit (ID)	Rate of Emission (lb/hr)	Process Weight Rate (ton/hr)
Shot Blast Unit North - Building 2	19.13	9.97
Shot Blast Unit South - Building 2	19.13	9.97

NOTE: The process weight rate used for the Rate of Emission (lb/hr) limitation for Shot Blast Unit North – Building 2 and Shot Blast Unit South – Building 2 is based on shot blasting a maximum of two (2) trailers per unit per hour at 8,200 pounds per trailer.

The pound per hour limitation was calculated with the following equation:

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

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

Based on calculations, the dust collector is not needed to comply with these limits.

Surface Coating - Wet Paint Booth (PB1)

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

Pursuant to 326 IAC 6-3-2(d), particulate from the wet paint booth, identified as PB1, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) 326 IAC 8-1-6 (New facilities; general reduction requirements)  
The Wet Paint Booth, identified as PB1, is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each unit is less than twenty-five (25) tons per year.
- (c) 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)  
The emission unit PB1 is not subject to 326 IAC 8-2-2 because it is not an automobile or light duty truck surface coating operation, as defined by 326 IAC 8-10-2.
- (d) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)  
The emission unit PB1 is subject to 326 IAC 8-2-9 because it was constructed after July 1, 1990, its actual before control emissions are greater than fifteen (15) pounds per day per emission unit, and it coats metal trailers.

Pursuant to 326 IAC 8-2-9(c)(1), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of four and three-tenths (4.3) pounds of VOC per gallon of coating, excluding water, as delivered to a coating applicator that applies clear coatings.

Pursuant to 326 IAC 8-2-9(c)(2), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating that is not a clear coating, excluding water, as delivered to the applicator.

Pursuant to 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:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) 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.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) 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 Operations

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(9), the welding operations (twenty-five (25) portable MIG welding stations) are exempt from the requirements of 326 IAC 6-3 because they do not operate as a process, and each welder consumes less than six hundred twenty-five (625) pounds of rod or wire per day.

#### Natural Gas Combustion

- (a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
--

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:
- (1) Compliance with the VOC content contained in 326 IAC 8-2-9 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 in 326 IAC 8-1-4.
  - (2) When using non-compliant coatings, to determine compliance with the VOC content limit in 326 IAC 8-2-9, the daily volume weighted average of coatings shall be calculated.

Pursuant to 326 IAC 8-1-2(a)(7), the volume weighted average of coatings 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.

(b) The monitoring requirements applicable to this source are as follows:

<b>Emission Unit/Control</b>	<b>Operating Parameters</b>	<b>Frequency</b>	<b>Range</b>	<b>Excursions and Exceedances</b>
Powder Coating Operations (Building 1 powder coating booth; and Building 2 PCBN and PCBS) Cartridge Filters and Dust Collectors	Baghouse Inspection	Quarterly	Normal- Abnormal	Response Steps
Wet Paint Booth (PB1) Dry Filters	Filter Checks	Once per day	Normal- Abnormal	Response Steps

(c) IDEM has determined there are no testing requirements applicable to any of the emissions units at this source.

<b>Conclusion and Recommendation</b>
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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 2, 2014.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. 069-35005-00066. The staff recommends to the Commissioner that this New Source Review and FESOP be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Joshua Levering 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) 234-6543 or toll free at 1-800-451-6027 extension 4-6543.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations**  
**Summary of Potential to Emit for FESOP #069-35005-00066**

Company Name: Novae Corporation  
Address City IN Zip: One Novae Parkway, Markle, IN 46770  
Permit Number: F069-35005-00066  
Reviewer: Joshua Levering  
Date: December 2014

Uncontrolled Emissions in tons/year								
	PM	PM10	PM2.5*	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs
Powder Coating	179.58	179.58	179.58	--	--	--	--	--
Shot Blasting	124.11	106.73	106.73	--	--	--	--	--
Wet Paint Booth	7.39	7.39	7.39	--	--	13.17	--	2.81
Welding	7.53	7.53	7.53	--	--	--	--	0.68
Natural Gas Combustion	0.22	0.89	0.89	0.07	11.70	0.64	9.83	0.22
<b>Total PTE (tons/yr)</b>	<b>318.82</b>	<b>302.12</b>	<b>302.12</b>	<b>0.07</b>	<b>11.70</b>	<b>13.81</b>	<b>9.83</b>	<b>3.71</b>
<u>Fugitive Emissions</u>								
Paved & Unpaved Roads	2.24	0.55	0.06	--	--	--	--	--

\* PM2.5 listed is direct PM2.5

Controlled Emissions in tons/year								
	PM	PM10	PM2.5*	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs
Powder Coating	44.90	44.90	44.90	--	--	--	--	--
Shot Blasting	31.03	26.68	26.68	--	--	--	--	--
Wet Paint Booth	0.37	0.37	0.37	--	--	13.17	--	2.81
Welding	7.53	7.53	7.53	--	--	--	--	0.68
Natural Gas Combustion	0.22	0.89	0.89	0.07	11.70	0.64	9.83	0.22
<b>Total PTE (tons/yr)</b>	<b>84.04</b>	<b>80.36</b>	<b>80.36</b>	<b>0.07</b>	<b>11.70</b>	<b>13.81</b>	<b>9.83</b>	<b>3.71</b>
<u>Fugitive Emissions</u>								
Paved & Unpaved Roads	2.24	0.55	0.06	--	--	--	--	--

\* PM2.5 listed is direct PM2.5

PTE After Issuance of Permit (Limited Emissions) in tons/year								
	PM	PM10	PM2.5*	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs
Powder Coating	44.94	44.94	44.94	--	--	--	--	--
Shot Blasting	31.01	31.01	31.01	--	--	--	--	--
Wet Paint Booth	0.37	0.37	0.37	--	--	13.17	--	2.81
Welding	7.53	7.53	7.53	--	--	--	--	0.68
Natural Gas Combustion	0.22	0.89	0.89	0.07	11.70	0.64	9.83	0.22
<b>Total PTE (tons/yr)</b>	<b>84.07</b>	<b>84.74</b>	<b>84.74</b>	<b>0.07</b>	<b>11.70</b>	<b>13.81</b>	<b>9.83</b>	<b>3.71</b>
<u>Fugitive Emissions</u>								
Paved & Unpaved Roads	2.24	0.55	0.06	--	--	--	--	--

\* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

**Appendix A: Emissions Calculations  
Powder Coating Operation**

Company Name: Novae Corporation  
 Address City IN Zip: One Novae Parkway, Markle, IN 46770  
 Permit Number: F069-35005-00066  
 Reviewer: Joshua Levering  
 Date: December 2014

Materials	Maximum Coating Usage (lbs/unit)	Maximum Units per Hour	Transfer Efficiency (%)	Uncontrolled Particulate (lbs/hr)	Uncontrolled Particulate (tons/yr)*	Cartridge Filter Control Efficiency (%)	Potential Particulate (lbs/hr)	Controlled Particulate (tons/yr)
Powder Coating - Building One	8	8	75.00%	16.00	70.08	75.0%	4.00	17.52
Powder Coating Booth North - Building 2	25	2	75.00%	12.50	54.75	75.0%	3.13	13.69
Powder Coating Booth South - Building 2	25	2	75.00%	12.50	54.75	75.0%	3.13	13.69
<b>Total</b>	<b>58</b>	<b>12</b>		<b>41.00</b>	<b>179.58</b>		<b>10.25</b>	<b>44.90</b>

\* PM=PM10=PM2.5

**Methodology**

Uncontrolled Particulate (lbs/hr) = Maximum Usage (lbs/hr) \* Transfer Efficiency (%)

Uncontrolled Particulate (tons/yr) = Maximum Usage (lbs/hr) \* Transfer Efficiency (%) \* 8760 (hrs/yr) \* 1/2000 (ton/lbs)

Potential Particulate (lbs/hr) = Uncontrolled Particulate (lbs/hr) \* (1- % Control Efficiency)

Potential Particulate (tons/yr) = Uncontrolled Particulate (lbs/hr) \* (1- % Control Efficiency) \* 8760 (hrs/yr) \* 1/2000 (ton/lbs)

**Appendix A: Emission Calculations  
Abrasive Blasting - Confined**

**Company Name: Novae Corporation  
Address City IN Zip: One Novae Parkway, Markle, IN 46770  
Permit Number: F069-35005-00066  
Reviewer: Joshua Levering  
Date: December 2014**

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

**Table 2 - Density of Abrasives (lb/ft3)**

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

**Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)**

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

**Calculations**

*Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)  
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =  
 D = Density of abrasive (lb/ft3) From Table 2 =  
 D1 = Density of sand (lb/ft3) =  
 ID = Actual nozzle internal diameter (in) =  
 ID1 = Nozzle internal diameter (in) from Table 3 =

720
487
99
0.375
0.375

**Flow Rate (FR) (lb/hr) = 3541.818 per nozzle**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time (%) of wet blasting =  
 N = number of nozzles =

PM	PM10/PM2.5
0.004	0.003
3541.818	3541.818
0	0
2	2

<b>Uncontrolled Emissions* =</b>	<b>28.33</b>	<b>24.37 lb/hr</b>
	<b>124.11</b>	<b>106.73 ton/yr</b>

\*This total is for both shot blasting units combined

<b>Control Efficiency =</b>	<b>75%</b>
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<b>Controlled Emissions* =</b>	<b>7.08</b>	<b>6.09 lb/hr</b>
	<b>31.03</b>	<b>26.68 ton/yr</b>

\*This total is for both shot blasting units combined

**METHODOLOGY**

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

PM10/PM2.5 Emission Factor = lb PM / lb abrasive (Table 1) x lb PM10 / lb PM (Table 1)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
Wet Paint Booth 1 (PB1)**

**Company Name: Novae Corporation  
Address City IN Zip: One Novae Parkway, Markle, IN 46770  
Permit Number: F069-35005-00066  
Reviewer: Joshua Levering  
Date: December 2014**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds/day)	Potential VOC (ton/yr)	Particulate Potential (pounds/hour)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>Wet Paint Booth 1</b>																
Primer - SW CC-A28	11.7	28.30%	0.0%	28.3%	0.0%	53.00%	1.10000	8.000	3.32	3.32	29.21	5.33	1.08	4.73	6.26	65%
Cleaning Solvent - MAK	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	0.000	6.75	6.75	6.75	1.23	0.00	0.00	0.00	100%
Topcoat -SW CC-B21	8.1	41.40%	0.0%	41.4%	0.0%	54.00%	1.10000	8.000	3.35	3.35	29.44	5.37	0.61	2.66	6.19	65%
Cleaning Solvent -MAK	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	0.000	6.75	6.75	6.75	1.23	0.00	0.00	0.00	100%

**State Potential Emissions**

**Add worst case coating to all solvents**

<b>72.15</b>	<b>13.17</b>	<b>1.69</b>	<b>7.39</b>
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Note: Solvent - Gal of Mat. is in gal/day

The unit/day maximum production accounted for both primer and topcoat being applied in a day.

<b>Controlled Particulate (dry filters, 95% control efficiency)</b>	<b>0.0843</b>	<b>0.3694</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/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/day) \* (365 days/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (ga/day \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(365 days/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations**

**Wet Paint Booth 1 (PB1)**

**HAP Emission Calculations**

**Company Name:** Novae Corporation  
**Address City IN Zip:** One Novae Parkway, Markle, IN 46770  
**Permit Number:** F069-35005-00066  
**Reviewer:** Joshua Levering  
**Date:** December 2014

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/day)	Weight % Ethyl Benzene	Weight % MIBK	Weight % Styrene	Weight % Glycol Ether	Ethyl Benzene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Styrene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)
Primer -SW CC-A28	11.7	1.100000	8.00	0.10%	10.00%	0.00%	0.00%	0.02	1.88	0.00	0.00
Topcoat-SW-CC-B21	8.1	1.100000	8.00	0.00%	0.00%	3.00%	4.00%	0.00	0.00	0.39	0.52

**Total State Potential Emissions:**      **0.02**      **1.88**      **0.39**      **0.52**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/day) \* Weight % HAP \* 365 days/yr

**Total HAPs**      **2.81**

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

**Company Name: Novae Corporation  
Address City IN Zip: One Novae Parkway, Markle, IN 46770  
Permit Number: F069-35005-00066  
Reviewer: Joshua Levering  
Date: December 2014**

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	Co	Cr	PM = PM10	Mn	Ni	Co	Cr		
WELDING														
Submerged Arc	0	0.0012	0.036	0.011				0.000	0.000	0.000			0	0.000
Metal Inert Gas (MIG)(carbon steel)	25	12.5	0.0055	0.0005				1.719	0.156	0.000			0	0.156
Stick (E7018 electrode)	0	113.7	0.0211	0.0009				0.000	0.000	0.000			0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	113.7	0.0055	0.0005				0.000	0.000	0.000			0	0.000
Oxyacetylene(carbon steel)	0		0.0055	0.0005				0.000	0.000	0.000			0	0.000
Gas Tungston Arc Welding (GTAW)*1	0	0.0012	0.0816	0.01	0.63	0.025	0.05	0.0000	0.0000	0.0000	0.00000		0	0.0000
Gas Tungston Arc Welding (GTAW)*1	0	0.0012	0.0816	0.02	0.13		0.2	0.0000	0.0000	0.0000	0.00000		0	0.0000
FLAME CUTTING	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)				HAPS (lbs/hr)		
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr			
Oxyacetylene	0			0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000	0.000	
Oxymethane	0			0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000	0.000	
Plasma**	0			0.0039				0.000	0.000	0.000	0.000	0.000	0.000	
EMISSION TOTALS														
Potential Emissions lbs/hr								1.72					0.16	
Potential Emissions lbs/day								41.25					3.75	
Potential Emissions tons/year								7.53					0.68	

\*1- Emissions factors not available for this weld method. Used AP42 SMAW weld method emissions factors.

**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, 1" thick)

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

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

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

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

**Company Name: Novae Corporation  
Address City IN Zip: One Novae Parkway, Markle, IN 46770  
Permit Number: F069-35005-00066  
Reviewer: Joshua Levering  
Date: December 2014**

Building	Emission Unit	Unit ID	Total MMBtu/hour
1	Hot Water Power Wash Station	PWS-1	0.25
1	Hot Water Power Wash Station	PWS-2	0.25
1	Drying Oven	PCDOV	0.25
1	Curing Oven	PCCOV	2.50
2	North Dry Off Oven	DOOVN	2.00
2	South Dry Off Oven	DOOVS	2.00
2	North Cure Oven	BKOVN	3.00
2	South Cure Oven	BKOVN	3.00
2	North Power Wash Water Heater	PWHN	3.50
2	South Power Wash Water Heater	PWHS	3.50
2	Three (3) Building Heat Make-up Air Heaters	AMU-1, AMU-2, AMU-3	7.00
<b>TOTAL</b>			<b>27.25</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
27.2	1020	234.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.2	0.9	0.9	0.1	11.7	0.6	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**

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total - Organics
Potential Emission in tons/yr	2.457E-04	1.404E-04	8.776E-03	2.106E-01	3.978E-04	<b>2.202E-01</b>

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals
Potential Emission in tons/yr	5.851E-05	1.287E-04	1.638E-04	4.446E-05	2.457E-04	<b>6.412E-04</b>

<b>Total HAPs</b>	<b>2.208E-01</b>
<b>Worst HAP</b>	<b>2.106E-01</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.

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

Company Name: **Novae Corporation**  
 Address City IN Zip: **One Novae Parkway, Markle, IN 46770**  
 Permit Number: **F069-35005-00066**  
 Reviewer: **Joshua Levering**  
 Date: **December 2014**

**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) -Purchased Materials	2.0	1.0	2.0	35.0	70.0	500	0.095	0.2	69.1
Vehicle (leaving plant) (one-way trip) - Empty	2.0	1.0	2.0	10.0	20.0	500	0.095	0.2	69.1
Vehicle (entering plant) (one-way trip) - Empty	12.0	1.0	12.0	7.5	90.0	150	0.028	0.3	124.4
Vehicle (leaving plant) (one-way trip) - Manufactured Trailers	12.0	1.0	12.0	25.0	300.0	150	0.028	0.3	124.4
<b>Totals</b>			<b>28.0</b>		<b>480.0</b>			<b>1.1</b>	<b>387.1</b>

Average Vehicle Weight Per Trip =  $\frac{17.1}{0.04}$  tons/trip  
 Average Miles Per Trip =  $\frac{17.1}{0.04}$  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 =	17.1	17.1	17.1	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	

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 =  $Ef * [1 - (p/4N)]$   
 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 =	1.578	0.316	0.0775	lb/mile
Mitigated Emission Factor, Eext =	1.443	0.289	0.0708	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)	0.05	0.01	0.00	0.05	0.01	0.00	0.05	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.05	0.01	0.00	0.05	0.01	0.00	0.05	0.01	0.00
Vehicle (entering plant) (one-way trip) - Empty	0.10	0.02	0.00	0.09	0.02	0.00	0.09	0.02	0.00
Vehicle (leaving plant) (one-way trip) - Empty	0.10	0.02	0.00	0.09	0.02	0.00	0.09	0.02	0.00
<b>Totals</b>	<b>0.31</b>	<b>0.06</b>	<b>0.01</b>	<b>0.28</b>	<b>0.06</b>	<b>0.01</b>	<b>0.28</b>	<b>0.06</b>	<b>0.01</b>

**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: Novae Corporation  
Address City IN Zip: One Novae Parkway, Markle, IN 46770  
Permit Number: F069-35005-00066  
Reviewer: Joshua Levering  
Date: December 2014**

**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)
Vehicle (entering plant) (one-way trip) - empty	12.0	1.0	12.0	7.5	90.0	650	0.123	1.5	539.2
Vehicle (leaving plant) (one-way trip) - Manufactured Trailers	12.0	1.0	12.0	25.0	300.0	650	0.123	1.5	539.2
<b>Totals</b>			<b>24.0</b>		<b>390.0</b>			<b>3.0</b>	<b>1078.4</b>

Average Vehicle Weight Per Trip =  $\frac{16.3}{0.12}$  tons/trip  
Average Miles Per Trip =  $\frac{16.3}{0.12}$  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 13.2.2-2 for Industrial Roads)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	16.3	16.3	16.3	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 =	5.52	1.41	0.14	lb/mi
Mitigated Emission Factor, Eext =	3.63	0.92	0.09	lb/mi
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)	1.49	0.38	0.04	0.98	0.25	0.02	0.98	0.25	0.02
Vehicle (leaving plant) (one-way trip)	1.49	0.38	0.04	0.98	0.25	0.02	0.98	0.25	0.02
<b>Totals</b>	<b>2.98</b>	<b>0.76</b>	<b>0.08</b>	<b>1.96</b>	<b>0.50</b>	<b>0.05</b>	<b>1.96</b>	<b>0.50</b>	<b>0.05</b>

**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.*

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

TO: Steve Bermes  
Novae Corporation  
1 Novae Parkway  
Markle, IN 46770

DATE: February 18, 2015

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

SUBJECT: Final Decision  
FESOP - Transition from Registration  
069 - 35005 - 00066

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:  
W.D. Gabbard Gabbard Environmental Services  
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



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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

February 18, 2015

TO: Huntington City Twp Public Library 200 W Market Huntington IN

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

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

**Applicant Name: Novae Corporation**  
**Permit Number: 069 - 35005 - 00066**

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

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

Enclosures  
Final Library.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	LPOGOST 2/18/2015 Novae Corporation 069 - 35005 - 00066 final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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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1		<del>Steve Bermes - Novae Corporation 1 Novae Parkway Markle IN 46770 (Source CAATS)</del> Via USPS certified mail										
2		Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)										
3		Huntington County Board of Commissioners 354 N. Jefferson St. Suite 201 Huntington IN 46750 (Local Official)										
4		Huntington City Twp Public Library 200 W Market Huntington IN 46750-2655 (Library)										
5		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
6		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
7		W.D. Gabbard Gabbard Environmental Services, Inc. 7611 Hope Farm Road Fort Wayne IN 46815 (Consultant)										
8		Huntington County Health Department 354 N. Jefferson Street, Suite 201 Huntington IN 46750 (Health Department)										
9		Melvin & Deborah Gillespie 5616 N 200 E Huntington IN 46750 (Affected Party)										
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