

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue . Indianapolis, IN 46204

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

Michael R. Pence

Thomas W. Easterly Commissioner

### NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

for Mascot Truck Parts in Hendricks County

FESOP No.: F063-35933-00074

The Indiana Department of Environmental Management (IDEM) has received an application from Mascot Truck Parts, located at 2799 Reeves Rd., Plainfield, IN 46168, for a new source construction and FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Mascot Truck Parts to construct and operate a new stationary heavy duty truck transmission, differential, and steering component remanufacturing facility.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit of any regulated pollutants will be limited to less than the TV and/or PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Plainfield-Guilford Township Public Library 1120 Stafford Road Plainfield, IN 46168

A copy of the preliminary findings is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>.

#### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F063-35933-00074 in all correspondence.





#### Comments should be sent to:

Adam Wheat IDEM, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 (800) 451-6027, ask for extension 3-8397 Or dial directly: (317) 233-8397 Fax: (317) 232-6749 attn: Adam Wheat

E-mail: awheat@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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: <a href="http://www.in.gov/idem/5881.htm">http://www.in.gov/idem/5881.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

#### What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Adam Wheat of my staff at the above address.

Nathan C. Bell, Section Chief

Permits Branch Office of Air Quality

# IDEM

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Michael R. Pence



Thomas W. Easterly

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

#### Mascot Truck Parts 2799 Reeves Road Plainfield, Indiana 46168

(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. F063-35933-00074		
Issued by:	Issuance Date:	
Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Expiration Date:	





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Plainfield, Indiana
Permit Reviewer: Adam Wheat

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#### **SECTION A**

#### **SOURCE SUMMARY**

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

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

The Permittee owns and operates a stationary heavy duty truck transmission, differential, and steering component remanufacturing facility.

Source Address: 2799 Reeves Road, Plainfield, Indiana 46168

General Source Phone Number: 317-839-9525

SIC Code: 3714 County Location: Hendricks

Source Location Status: Attainment for all criteria pollutants

Source Status: Federally Enforceable State Operating Permit Program

Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

Not 1 of 28 Source Categories

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

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

- (a) One (1) Pangborn table blast abrasive blaster, identified as TB-1, approved in 2015 for construction, with a maximum capacity of 32,500 pounds of steel shot per hour and 4,000 pounds of parts per hour, using a dust collector (TBDC-1) as control, and exhausting to stack TB-1S.
- (b) Two (2) paint booths, identified as PB-1 and PB-2, approved in 2015 for construction, with a maximum capacity of 10 assemblies per hour each, using dry filters, identified as PBDC-1 and PBDC-2 respectively, as controls, and exhausting to stacks PB-1S and PB-2S.
- (c) One (1) paint booth, identified as PB-3, approved in 2015 for construction, with a maximum capacity of 20 assemblies per hour, using dry filters as control, and exhausting to stack PB-3S.
- (d) One (1) degreasing operation, identified as D-1, approved in 2015 for construction, with a maximum capacity of 1,440 gallons per year, and exhausting to the indoors, consisting of the following:
  - (1) Five (5) cold cleaner degreaser unit and one (1) vibratory degreaser tank, using 1,020 gallons per year of solvent, total; and
  - One (1) handwipe degreasing operation, using a maximum of 420 gallons per year of solvent.

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

This stationary source also includes the following insignificant activities:

- (a) Miscellaneous hand applied adhesives, degreasers, paint, rust preventative, cutting fluid, lubricants, sealants, putty, and die layout fluid containing VOC, approved in 2015 for construction, utilizing spray cans, roll coat methods, and flow coat methods, with combined VOC emissions less than fifteen (15) pounds per day. The source also applies InkJet printing ink.
- (b) Two (2) welding stations, approved in 2015 for construction, each using less than (625) pounds of weld wire per day, utilizing no control, exhausting to the indoors.
- (c) Two (2) oxyacetylene cutting torches, approved in 2015 for construction, each with a maximum cutting capacity of 12 inches per minute when cutting two (2) inch metal stock, and exhausting to the indoors.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting within the building, and consisting of:
  - (1) Seven (7) air handling units, identified as HVAC-1 through HVAC-7, approved in 2015 for construction, with a maximum capacity of 1.00 MMBtu/hr, and exhausting to the outdoors.
  - (2) Two (2) air handling units, identified as HVAC-9 through HVAC-10, approved in 2015 for construction, with a maximum capacity of 1.60 MMBtu/hr, and exhausting to the outdoors.

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

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

#### **SECTION B**

#### **GENERAL CONDITIONS**

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

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

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

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

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

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

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

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

- (a) This permit, F063-35933-00074, 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 or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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- (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;

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

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

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

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

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

- (a) All terms and conditions of permits established prior to F063-35933-00074 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or

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- (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(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] [40 CFR 72]

- (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) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]
- (c) 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).

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act:
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

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(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.
- (e) This condition does not apply to emission trades of SO<sub>2</sub> or NO<sub>X</sub> under 326 IAC 21 or 326 IAC 10-4.

#### 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.

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#### 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.

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#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

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

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

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

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

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

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), 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 one hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

- (a) Opacity shall not exceed an average of 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.

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

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

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

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

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

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

#### C.7 Stack Height [326 IAC 1-7]

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]

- (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).

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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)]

(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 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

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

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

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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).

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

#### C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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

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

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

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

#### **Emissions Unit Description:**

(a) One (1) Pangborn table blast abrasive blaster, identified as TB-1, approved in 2015 for construction, with a maximum capacity of 32,500 pounds of steel shot per hour and 4,000 pounds of parts per hour, using a dust collector (TBDC-1) as control, and exhausting to stack TB-1S.

(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 Particulate Matter (PM) PSD Minor Limitation [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, PM emissions (after control) from the abrasive blaster (TB-1) shall not exceed 1.30 pounds per hour.

Compliance with this limit, in conjunction with the potential to emit PM from all other emission units at this source, shall limit the source-wide PM emissions to less than 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.1.2 PM10 and PM2.5 FESOP Limit [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)) and 326 IAC 2-7 (Part 70 Permits) not applicable, PM10 and PM2.5 emissions from the abrasive blaster (TB-1) shall not exceed 1.12 pounds per hour.

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 PM10 and PM2.5 emissions to less than 100 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the table blast abrasive blaster (TB-1) shall not exceed 28.67 pounds per hour when operating at a process weight rate of 18.25 pounds per hour.

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

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

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

Where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

#### D.1.4 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.1.5 Particulate Control

- (a) In order to comply with Condition D.1.1, D.1.2, and D.1.3, the dust collector (TBDC-1) for particulate control shall be in operation and control emissions from the abrasive blaster (TB-1) at all times the abrasive blaster (TB-1) is in operation.
- (b) 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 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collector (TBDC-1) used in conjunction with the abrasive blaster (TB-1), at least once per day when this process is in operation. When for any one reading, the pressure drop across the dust collector (TBDC-1) is outside the normal range, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the abovementioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

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

#### D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain a daily record of the pressure drop across the dust collector (TBDC-1) controlling the abrasive blaster (TB-1). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (e.g., the process did not operate that day).
- (b) Section C General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

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DRAFT

#### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

- (b) Two (2) paint booths, identified as PB-1 and PB-2, approved in 2015 for construction, with a maximum capacity of 10 assemblies per hour each, using dry filters, identified as PBDC-1 and PBDC-2 respectively, as controls, and exhausting to stacks PB-1S and PB-2S.
- (c) One (1) paint booth, identified as PB-3, approved in 2015 for construction, with a maximum capacity of 20 assemblies per hour, using dry filters as control, and exhausting to stack PB-3S.

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

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

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

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

#### D.2.2 Volatile Organic Compound (VOC) Content Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, when coating miscellaneous metal parts and products in the paint booth PB-1, PB-2, and PB-3, the Permittee shall comply with the following:

- (a) No owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:
  - (1) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that:
    - (A) lacks color or opacity; and
    - (B) is transparent and uses the undercoat as a reflectant base or undertone color.
  - (2) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
  - (3) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:
    - (A) Temperatures consistently above ninety-five (95) degrees Celsius;
    - (B) detergents;
    - (C) abrasive or scouring agents;
    - (D) solvents;

- (E) corrosive atmospheres;
- (F) outdoor weather at all times; or
- (G) similar environmental conditions.
- (4) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.
- (b) 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.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

#### **Compliance Determination Requirements**

#### D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limitations contained in Conditions D.2.2 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 specified in 326 IAC 8-1-4.

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

#### D.2.5 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 paint booths (PB-1, PB-2, and PB-3) stacks (PB-1S and PB-2S) 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

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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.2.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (b) To document compliance with Condition D.2.2 the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limitations established in Condition D.2.2.
  - (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.
- (c) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

#### **Emissions Unit Description:**

- (d) One (1) degreasing operation, identified as D-1, approved in 2015 for construction, with a maximum capacity of 1,440 gallons per year, and exhausting to the indoors, consisting of the following:
  - (1) Five (5) cold cleaner degreaser unit and one (1) vibratory degreaser tank, using 1,020 gallons per year of solvent, total; and
  - (2) One (1) handwipe degreasing operation, using a maximum of 420 gallons per year of solvent.

(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 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for each of the cold cleaner degreasers, the Permittee shall:

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

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department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
  - (A) must be a solid, fluid stream; and
  - (B) shall be applied at a pressure that does not cause excessive splashing.

#### D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

#### Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.3.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.1, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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Mascot Truck Parts Plainfield, Indiana Permit Reviewer: Adam Wheat

Source Name:

Date:

DRAFT

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

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

**Mascot Truck Parts** 

Source Address: 2799 Reeves Road, Plainfield, Indiana 46168 FESOP Permit No.: F063-35933-00074 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:

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## 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: Mascot Truck Parts

Source Address: 2799 Reeves Road, Plainfield, Indiana 46168

FESOP Permit No.: F063-35933-00074

#### This form consists of 2 pages

Page 1 of 2

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  - The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A
Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <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:

Source Name:

DRAFT

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## 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

**Mascot Truck Parts** 

Source Address: 2799 Reeves Road, Plainfield, Indiana 46168 FESOP Permit No.: F063-35933-00074				
Months:	to	Year:	 Page 1 of 2	
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".				
□ NO DEVIATIONS OCCUR	RED THIS REPORTI	NG PERIOD.		
☐ THE FOLLOWING DEVIAT	IONS OCCURRED	THIS REPORTING PERIOD		
Permit Requirement (specify permit condition #)				
Date of Deviation:		Duration of Deviation:		
Number of Deviations:				
Probable Cause of Deviation:				
Response Steps Taken:				
Permit Requirement (specify	permit condition #)			
Date of Deviation:		Duration of Deviation:		
Number of Deviations:				
Probable Cause of Deviation:				
Response Steps Taken:				

Page 2 of 2

	1 age 2 of 2	
Permit Requirement (specify permit condition #)		
Date of Deviation:	Duration of Deviation:	
Number of Deviations:		
Probable Cause of Deviation:		
Response Steps Taken:		
Permit Requirement (specify permit condition #)		
Date of Deviation:	Duration of Deviation:	
Number of Deviations:		
Probable Cause of Deviation:		
Response Steps Taken:		
Permit Requirement (specify permit condition #)		
Date of Deviation:	Duration of Deviation:	
Number of Deviations:		
Probable Cause of Deviation:		
Response Steps Taken:		
Form Completed by:		
Title / Position:		
Date:		
Phone:		



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

Mascot Truck Parts 2799 Reeves Road Plainfield, Indiana 46168

#### Affidavit of Construction

l,	, bei	ng duly sworn upon i	my oath, depose a	and say:	
(Name o	of the Authorized Representative)			·	
1.	I live in(21) years of age, I am competent	County, to give this affidavit.	, Indiana and bein	ng of sound mind a	nd over twenty-one
2.	I hold the position of(	Γitle)	for	(Company Nar	ne)
3.	By virtue of my position with				, I have personal
	knowledge of the representations of these representations on behalf of	contained in this affic	davit and am author	orized to make	
			(Company	Name)	
4.	I hereby certify that Mascot Truck of the heavy duty truck transmissionapplication received by the Office of Construction Permit and Federally 063-00074 issued on	on, differential, and since in conformity with the of Air Quality on June Enforceable State C	teering componer e requirements ar e 9, 2015 and as p operating Permit N	nt remanufacturing and intent of the cor permitted pursuan	facility estruction permit to New Source
5.	Permittee, please cross out the were constructed/substituted as de accordance with the construction p	escribed in the attach			
Further Affiant sa	id not.				
I affirm under per and belief.	nalties of perjury that the represent	ations contained in	this affidavit are	true, to the best	of my information
and belief.		Signature			
STATE OF INDIA (	NNA) SS				
COUNTY OF	)				
Subscri	bed and sworn to me, a notary pub	olic in and for		County a	nd State of Indiana
on this	day of	<u>,</u> 20	My Commiss	ion expires:	<u>.</u>
		Sign	nature		(typed or printed)
		iNar	ne		_ (typea or printed)

# Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction Federally Enforceable State Operating Permit (FESOP)

# **Source Description and Location**

Source Name: Mascot Truck Parts

Source Location: 2799 Reeves Road, Plainfield, IN 46168

County: Hendricks

SIC Code: 3714 (Motor Vehicle Parts and Accessories)

Operation Permit No.: F063-35933-00074
Permit Reviewer: Adam Wheat

On June 9, 2015, the Office of Air Quality (OAQ) received an application from Mascot Truck Parts related to the construction and operation of a new stationary heavy duty truck transmission, differential, and steering component remanufacturing facility.

### **Existing Approvals**

There have been no previous approvals issued to this source.

#### **County Attainment Status**

The source is located in Hendricks County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
СО	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>	Attainment effective July 11, 2013, 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>&</sup>lt;sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

#### (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. Hendricks 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) $PM_{2.5}$

Hendricks County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Mascot Truck Parts Plainfield, Indiana Permit Reviewer: Adam Wheat

# (c) Other Criteria Pollutants

Hendricks 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 New Source Construction**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Mascot Truck Parts on June 9, 2015, relating to the construction and operation of a new stationary heavy duty truck transmission, differential, and steering component remanufacturing facility. The facilities proposed operations are currently part of the Meritor Heavy Vehicle Systems, LLC (063-00046) operation located at 849 Whitaker Rd., Plainfield, IN 46168. However, these portions of the Meritor operation are being split off and will operate as an independent entity. These facilities are under separate ownership and control, are located about 1 mile apart, and will not be providing any raw materials, products, or services to each other.

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

- (a) One (1) Pangborn table blast abrasive blaster, identified as TB-1, approved in 2015 for construction, with a maximum capacity of 32,500 pounds of steel shot per hour and 4,000 pounds of parts per hour, using a dust collector (TBDC-1) as control, and exhausting to stack TB-1S.
- (b) Two (2) paint booths, identified as PB-1 and PB-2, approved in 2015 for construction, with a maximum capacity of 10 assemblies per hour each, using dry filters, identified as PBDC-1 and PBDC-2 respectively, as controls, and exhausting to stacks PB-1S and PB-2S.
- (c) One (1) paint booth, identified as PB-3, approved in 2015 for construction, with a maximum capacity of 20 assemblies per hour, using dry filters as control, and exhausting to stack PB-3S.
- (d) One (1) degreasing operation, identified as D-1, approved in 2015 for construction, with a maximum capacity of 1,440 gallons per year, and exhausting to the indoors, consisting of the following:
  - (1) Five (5) cold cleaner degreaser unit and one (1) vibratory degreaser tank, using 1,020 gallons per year of solvent, total; and
  - (2) One (1) handwipe degreasing operation, using a maximum of 420 gallons per year of solvent.

The following is a list of the insignificant activities:

(a) Miscellaneous hand applied adhesives, degreasers, paint, rust preventative, cutting fluid, lubricants, sealants, putty, and die layout fluid containing VOC, approved in 2015 for construction, utilizing spray cans, roll coat methods, and flow coat methods, with combined VOC emissions less than fifteen (15) pounds per day. The source also applies InkJet printing ink.

- (b) Two (2) welding stations, approved in 2015 for construction, each using less than (625) pounds of weld wire per day, utilizing no control, exhausting to the indoors.
- (c) Two (2) oxyacetylene cutting torches, approved in 2015 for construction, each with a maximum cutting capacity of 12 inches per minute when cutting two (2) inch metal stock, and exhausting to the indoors.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, utilizing no control, exhausting within the building, and consisting of:
  - (1) Seven (7) air handling units, identified as HVAC-1 through HVAC-7, approved in 2015 for construction, each with a maximum capacity of 1.00 MMBtu/hr, and exhausting to the outdoors.
  - (2) Two (2) air handling units, identified as HVAC-9 through HVAC-10, approved in 2015 for construction, each with a maximum capacity of 1.60 MMBtu/hr, and exhausting to the outdoors.

#### **Enforcement Issues**

There are no pending enforcement actions related to this source.

#### **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	582.4
PM10 <sup>(1)</sup>	502.9
PM2.5 <sup>(1)</sup>	502.9
SO <sub>2</sub>	0.03
$NO_x$	4.38
VOC	14.65
CO	3.68
Highest Single HAP	0.90 (Cobalt)
Total HAPs	1.48

- (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".
- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) 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.

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(b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) 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.

	Р	otential T	o Emit of t	he Entir	e Source	e After Is	suance (	of FESOP (t	ons/year)
Process/ Emission Unit	PM	PM10*	PM2.5*	SO <sub>2</sub>	NOx	VOC	СО	Total HAPs	Worst Single HAP
Abrasive Blaster (TB-1)**	5.69	4.90	4.90	-	1	-	1	-	-
Surface Coating (PB-1, PB-2, PB-3)***	0.52	0.52	0.52	-	-	7.05	-	0.90	0.90 (Cobalt)
Degreasing Operation	-	-	-	-	-	5.26	-	-	-
Welding and Thermal Cutting	2.07	2.07	2.07	-	-	-	-	0.02	0.02 (Manganese)
Miscellaneous Chemicals	ı	-	-	-	ı	2.10	ı	0.48	0.17 (Methyl Alcohol)
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.38	0.24	3.68	0.08	0.08 (Hexane)
Total PTE of Entire Source	8.92	8.37	8.37	0.03	4.38	14.65	3.68	1.48	0.90 (Cobalt)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10

<sup>\*</sup>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 new 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 new 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) The PM10 and PM2.5 emissions (after control) from the abrasive blaster (TB-1) shall each not exceed 1.12 pounds per hour.

Compliance with these limits, in conjunction with the potential to emit PM 10 and PM2.5 from all other emission units at this source, shall limit the source-wide PM10 and PM2.5 emissions to less

<sup>\*\*</sup>PM, PM10, and PM2.5 emissions from the Abrasive Blaster (TB-1) are limited to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

\*\*\*Pursuant to 326 IAC 6-3-2(d), the particulate from paint booths PB-1, PB-2, and PB-3 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.

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than 100 tons per 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 new 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,
- 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:

- (1) The PM emissions (after control) from the abrasive blaster (TB-1) shall not exceed 1.30 pounds per hour.
- (2) The PM10 and PM2.5 emissions (after control) from the abrasive blaster (TB-1) shall each not exceed 1.12 pounds per hour.

Compliance with these limits, in conjunction with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide PM, PM10, and PM2.5 emissions 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 <a href="http://www.supremecourt.gov/opinions/13pdf/12-1146\_4g18.pdf">http://www.supremecourt.gov/opinions/13pdf/12-1146\_4g18.pdf</a>) 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 Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since the surface coating operation at this source does not coat metal furniture. The source coats heavy duty truck transmissions, differentials, and steering gears/components.
- (b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source is not located at an automobile or light-duty truck assembly plant.
- (c) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliance, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since the surface coating operation is not located in a large appliance surface coating line.

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

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included for this permit, since the degreasing operation, identified as D-1, does not use a cold solvent cleaner/degreasing solvent containing methylene chloride, perchlorethylene, trichloroethylene, 1,1,1-trichlorethane, carbon tetrachloride, chloroform, or any combination of these halogenated HAP solvents.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (4I), (326 IAC 20-85), is not included in the permit, since this source does not coat automobile or light duty truck body parts and is not a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included in the permit, since this source is not considered a major source of HAPs and does not coat metal furniture. The source coats heavy duty truck transmissions, differentials, and steering gears/components.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products Surface Coating, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source is not considered a major source of HAPs.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81), are not included in the permit for the surface coating operation, because this source is not a major source of HAPs and does not perform surface coating of plastic parts or plastic products. The source coats heavy duty truck transmissions, differentials, and steering gears/components.
- (i) The requirements of the National Emission Standards for the Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, (326 IAC 20-95), are not included in the permit, since this source is not considered a major source of HAPs.
- (j) The requirements of 40 CFR Part 63, Subpart HHHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources), are not included in this permit because this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, perform spray application of coatings to mobile vehicles and mobile equipment, or perform spray application of a coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrate.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit, because the operations at this source fall under SIC code 3714 (NAICS Code: 336350), which is not one of the nine source categories listed in 40 CFR 63.11514 (see Federal Register, 73 FR 43000, July 23, 2008, for the list of NAICS codes for regulated source categories).
- (I) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

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#### Compliance Assurance Monitoring (CAM)

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

#### **State Rule Applicability Determination**

The following state rules are applicable to the source:

- (a) <u>326 IAC 2-8-4 (FESOP)</u>
  - 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 6.5 (PM Limits except Lake County)
  This source is not subject to 326 IAC 6.5 because it is not located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne County and it does not have the potential to emit particulate matter is equal to or greater than 10 tons per year.
- (g) 326 IAC 6.8 (PM Limits except Lake County)

  This source is not subject to 326 IAC 6.8 because it is not located in Lake County and it does not have the potential to emit particulate matter is equal to or greater than 10 tons per year.
- (h) 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.

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- (i) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

  The source is not subject to the requirements of 326 IAC 6-5, because it has potential fugitive particulate emissions less than 25 tons per year.
- (j) <u>326 IAC 12 (New Source Performance Standards)</u> See Federal Rule Applicability Section of this TSD.
- (k) <u>326 IAC 20 (Hazardous Air Pollutants)</u> See Federal Rule Applicability Section of this TSD.

### **Shot Blasting Operation**

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the table blast abrasive blaster since it is a manufacturing process with potential particulate emissions greater than or equal to 0.551 pounds per hour.

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the shot blasting operation shall not exceed 28.67 pounds per hour when operating at a process weight rate of 18.25 tons per hour (based on maximum usage of 16.25 tons/hour steel shot and a maximum processing rate of 2.0 tons/hour of parts blasted). The pound per hour limitation was calculated with the following equation:

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

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

The baghouse dust collector, identified as TBDC-1, shall be in operation at all times the shot blasting operation is in operation, in order to comply with this limit.

#### Paint Booths

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

  Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to each of the paint booths (PB-1, PB-2, and PB-3), since each paint booth uses more than five (5) gallons per day of coating and is located anywhere in the state. Pursuant to 326 IAC 6-3-2(d), particulate from paint booths PB-1, PB-2, and PB-3, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
  Each of the new paint booths (PB-1, PB-2, and PB-3) is not subject to the requirements of 326
  IAC 8-1-6, since the unlimited VOC potential emissions from each booth is less than twenty-five (25) tons per year.
- (c) 326 IAC 8-2-2 (Volatile Organic Compounds, Automobile and Light Duty Truck Coating Operations)

The requirements of 326 IAC 8-2-2 are not applicable to this source, since this source does not perform surface coating of automobiles or light duty trucks as defined in 326 IAC 8-2-2(a). This source coats heavy duty truck transmissions, differentials, and steering gears/components

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

Pursuant to 326 IAC 8-2-9(a)(1)(E), the paint booths are subject to the requirements of 326 IAC 8-2-9, since each performs miscellaneous metal coating operations, operates under the major SIC code group #37, and has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

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(1) Pursuant to 326 IAC 8-2-9, when coating miscellaneous metal parts and products in the paint booths (PB-1, PB-2, PB-3), the Permittee shall not allow the discharge into the atmosphere VOC in excess of the following:

- (A) Four and three-tenths (4.3) pounds per gallon of coating, excluding water, as delivered to the applicator in each paint booth where clear coatings are applied. A clear coating is a coating that:
  - (i) lacks color or opacity; and

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- (ii) is transparent and uses the undercoat as a reflectant base or undertone color.
- (B) Three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator in each paint booth where units are air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
- (C) Three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator in each paint booth where extreme performance coatings are applied. Extreme performance coatings are designed for exposure to:
  - (i) Temperatures consistently above 95 degrees Celsius;
  - (ii) detergents;
  - (iii) abrasive or scouring agents;
  - (iv) solvents;
  - (v) corrosive atmosphere;
  - (vi) outdoor weather at all times; or
  - (vii) similar environmental conditions
- (D) Three (3) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator in each paint booth for all other coatings and coating application systems.
- (2) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
  - Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (ii) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (iii) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (iv) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

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- (v) 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.
- (e) There are no other 326 IAC 8 Rules that are applicable to the surface coating operation.

#### Degreasing

- (a) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
  The degreasing operation (D-1) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions is less than twenty-five (25) tons per year.
- (b) 326 IAC 8-3-2 (Cold Cleaner Operations)

  Pursuant to 326 IAC 8-3-2(a)(1), the degreasing operation (D-1) is subject to the requirements of 326 IAC 8-3-2, since it was constructed after July 1, 1990, and performs organic solvent degreasing.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the degreasing operation (D-1) shall:

- (1) Equip the degreaser with a cover;
- (2) Equip the degreaser with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the degreaser;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label that lists the operation requirements in subdivisions (3), (4), (6), and (7);
- (6) Store waste solvent only in closed containers.
- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (c) 326 IAC 8-3-5 (Cold Cleaner Degreaser)
  On January 30, 2013, the Indiana Environmental Control Board repealed 326 IAC 8-3-5 (Cold Cleaner Degreaser). Therefore, the source is not subject to this rule.
- (d) 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers).

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

#### Welding

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

Pursuant to 326 IAC 6-3-1(b)(9), the requirements of 326 IAC 6-3-2 are not applicable to the welding operation since it uses less than 625 pounds of rod or wire per day.

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# **Thermal Cutting**

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

Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable to the thermal cutting operation since it is a manufacturing process with potential particulate emissions less than 0.551 pounds per hour.

## Miscellaneous VOC Usage

- (a) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
  The miscellaneous VOC usage at the source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions is less than twenty-five (25) tons per year.
- (c) 326 IAC 8-2-2 (Volatile Organic Compounds, Automobile and Light Duty Truck Coating Operations)

  The requirements of 326 IAC 8-2-2 are not applicable to miscellaneous paint operation at the source since this source does not perform surface coating of automobiles or light duty trucks as defined in 326 IAC 8-2-2(a). This source coats heavy duty truck transmissions, differentials, and steering gears/components.
- (d) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)

  Pursuant to 326 IAC 8-2-9(a), the miscellaneous painting usage is not subject to the requirements of 326 IAC 8-2-9, since each miscellaneous painting usage does not have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.
- (e) 326 IAC 8-5-5 (Graphic Arts Operations)
  Pursuant to 326 IAC 8-5-5(a), the miscellaneous inkjet printing ink usage is not subject to the requirements of 326 IAC 8-5-5, since the miscellaneous inkjet printing ink usage does not meet the definition of packaging rotogravure, publication rotogravure, or flexographic printing and does not have the potential to emit greater than 25 tons per year or more of VOC.

#### **Natural Gas-Fired Combustion Units**

- (n) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

  The natural gas-fired combustion units are each not subject to 326 IAC 6-2 since each is not a source of indirect heating, as defined by 326 IAC 1-2-19.
- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

  The natural gas-fired combustion units at the source are exempt from the requirements of 326 IAC 6-3, because pursuant to 326 IAC 6-3-2(c)(3) each is not considered manufacturing processes and, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.
- (b) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
  Pursuant to 326 IAC 7-1.1-1, the natural gas-fired combustion units are not subject to the requirements of 326 IAC 7-1.1, since each has unlimited sulfur dioxide (SO<sub>2</sub>) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively.
- (c) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
  The natural gas-fired combustion units are not subject to the requirements of 326 IAC 8-1-6, since the potential unlimited VOC emissions from each unit is less than twenty-five (25) tons per year.

### **Compliance Determination, Monitoring and Testing Requirements**

(a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
TB-1 / Dust Collector (TBDC-1)	Pressure Drop	Once per day
	Filter Checks	Once per day
PB-1, PB-2, PB-3 / Dry Filters	Overspray Observation	Once per week
	Stack Exhaust Observation	Once per month

(b) There are no testing requirements applicable to the source.

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 9, 2015.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F063-35933-00074. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Adam Wheat at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.
- (b) A copy of the findings is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>
- (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: <a href="http://www.in.gov/idem/5881.htm">http://www.in.gov/idem/5881.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

#### Appendix A: Emissions Calculations **Emission Summary**

Company Name: Mascot Truck Parts Source Address: 2799 Reeves Road, Plainfield, IN 46168

Permit No.: F063-35933-00074 Reviewer: Adam Wheat

			Uncor	ntrolled En	nissions (to	ons/yr)						
Emission Units	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	voc	со	CO2e	Total HAPs		Highest Single HAP	
Abrasive Blaster (TB-1)	569.4	489.7	489.7	-	-	-	-	-	-	-	-	
Surface Coating (PB-1, PB-2, PB-3)	10.30	10.30	10.30	-	-	7.05	-	-	0.90	0.90	Cobalt	
Degreasing Operation	-	-	-	-	-	5.26	-	-	-	-	-	
Welding and Thermal Cutting	2.07	2.07	2.07	-	-	-	-	-	0.02	0.02	Manganese	
Miscellaneous Chemicals	0.56	0.56	0.56	-	-	2.10	-		0.48	0.17	Methyl Alcohol	
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.38	0.24	3.68	5,287	0.08	0.08	Hexane	
Total PTE	582.4	502.9	502.9	0.03	4.38	14.65	3.68	5.287	1.48	0.90	Cobalt	

	Limited Emissions (tons/yr)														
Emission Units	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	voc	со	CO2e	Total HAPs		Highest ingle HAP				
Abrasive Blaster (TB-1)*	5.69	4.90	4.90	-	-	-	-	-	-	-	-				
Surface Coating (PB-1, PB-2, PB-3)**	0.52	0.52	0.52	-	-	7.05	-	-	0.90	0.90	Cobalt				
Degreasing Operation	-	-	-	-	-	5.26	-	-	-	-	-				
Welding and Thermal Cutting	2.07	2.07	2.07	-	-	-	-	-	0.02	0.02	Manganese				
Miscellaneous Chemicals	0.56	0.56	0.56	-	-	2.10	-	0.00	0.48	0.17	Methyl Alcohol				
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.38	0.24	3.68	5,287	0.08	0.08	Hexane				
Total PTE	8.92	8.37	8.37	0.03	4.38	14.65	3.68	5.287	1.48	0.90	Cobalt				

			Limited and	d Controlle	ed Emissio	ns (tons/yr	r)						
Emission Units	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	voc	со	CO2e	Total HAPs		Highest Single HAP		
Abrasive Blaster (TB-1)*	5.69	4.90	4.90	-	-	-	-	-	-	-	-		
Surface Coating (PB-1, PB-2, PB-3)**	0.52	0.52	0.52	-	-	7.05	-	-	0.05	0.05	Cobalt		
Degreasing Operation	-	-	-	-	-	5.26	-	-	-	-	-		
Welding and Thermal Cutting	2.07	2.07	2.07	-	-	-	-	-	0.02	0.02	Manganese		
Miscellaneous Chemicals	0.56	0.56	0.56	-	-	2.10	-	0.00	0.48	0.17	Methyl Alcohol		
Natural Gas Combustion	0.08	0.33	0.33	0.03	4.38	0.24	3.68	5,287	0.08	0.08	Hexane		
Total PTF	8 92	8 37	8 37	0.03	4 38	14 65	3.68	5 287	0.62	0.17	Methyl Alcohol		

<sup>\*\*</sup>PM, PM10, and PM2.5 emissions from the Abrasive Blaster (TB-1) are limited to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.
\*\*Pursuant to 326 IAC 6-3-2(d), the particulate from paint booths PB-1, PB-2, and PB-3 shall be controlled by a dry particulate filter and the Permittee shall operate the

control device in accordance with manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.

#### Appendix A: Emissions Calculations Abrasive Blasting - Confined Abrasive Blaster (TB-1)

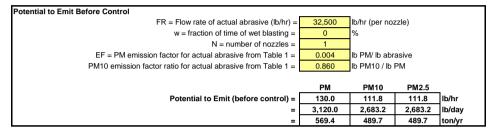
Company Name: Mascot Truck Parts

Source Address: 2799 Reeves Road, Plainfield, IN 46168

Permit No.: F063-35933-00074 Reviewer: Adam Wheat

Table 1 - Emission Factors for Abrasives

	Emission Fa	ctor (EF)				
Abrasive	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					



Potential to Emit After Control	PM	PM10	PM2.5	
Emission Control Device Efficiency =	99.0%	99.0%	99.0%	
Potential to Emit (after control) =	1.30	1.12	1.12	lb/hr
=	31.20	26.83	26.83	lb/day
=	5.69	4.90	4.90	ton/yr

Limited Potential to Emit		PM	PM10	PM2.5
	Limited PTE (lb/hr) =	1.30	1.12	1.12
	Liimited PTE (tons/yr) =	5.69	4.90	4.90
	, ,,,			•

#### METHODOLOGY

PM2.5 emissions assumed equal to PM10 emissions.

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

= EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50)) Potential to Emit (before control)

= [Potential to Emit (before control)] \* [1 - control efficiency] Potential to Emit (after control) Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

#### Appendix A: Emissions Calculations VOC and Particulate From Surface Coating Operations Surface Coating (PB-1, PB-2, PB-3)

Company Name: Mascot Truck Parts
Source Address: 2799 Reeves Road, Plainfield, IN 46168

Permit No.: F063-35933-00074 Reviewer: Adam Wheat

Material	Density (Lb/Gal)		Weight % Water and Exempt VOC	Weight % VOC	Volume % Water and Exempt VOC	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Weight % Cobalt	Cobalt Emissions (tons/yr)
PB-1																		
NCP N-5570N Black Primer	11.75	42.80%	29.10%	13.70%	41.00%	38.70%	0.030	10.000	2.73	1.61	0.48	11.59	2.12	3.09	4.16	65%	5.0%	0.27
PB-2																		
NCP N-5570N Black Primer	11.75	42.80%	29.10%	13.70%	41.00%	38.70%	0.030	10.000	2.73	1.61	0.48	11.59	2.12	3.09	4.16	65%	5.0%	0.27
PB-3						-											-	
NCP N-5570N Black Primer	11.75	42.80%	29.10%	13.70%	41.00%	38.70%	0.020	20.000	2.73	1.61	0.64	15.45	2.82	4.12	4.16	65%	5.0%	0.36

Potential to Emit (Before Control): 1.61 38.63

7.05

10.30

0.90

METHODOLOGY

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % VOC) / (1-Volume % Water and Exempt VOC)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % VOC)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

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

Cobalt Emissions (tons/yr) = (units/hour) \* (gal/unit) \* (Weight % VOC) / (Volume % Solids)

Potential to Emit (After Control) = Potential to Emit (Before Control) \* (1 - Control Efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Control Efficiency: 95.00%

95.00%

Potential to Emit (After Control): 0.52

0.05

# Appendix A: Emissions Calculations Degreasing

Page 4 of 8 TSD App A

Company Name: Mascot Truck Parts

Source Address: 2799 Reeves Road, Plainfield, IN 46168

**Permit No.:** F063-35933-00074 **Reviewer:** Adam Wheat

Type of Operation	VOC content of Solvent (lbs/gal)	Maximum Amount of Solvent Used* (gal/year)	PTE for VOC (tons/year)
Handwipe Solvent usage	7.3	420.00	1.53
Five (5) Cold Cleaner Degreasers Units  One (1) Vibratory Degreaser Tank	7.3	1,020.00	3.72
		Total	5.26

### **METHODOLOGY**

The degreaser used by the source does not contain any HAPs.

VOC Content of Solvent based upon Crystal Clean MSDS

PTE = VOC Content (lbs/gal) \* Max. Amount of Solvent used (gal/year) \* 1 ton/2000 lbs

<sup>\*</sup>Based on information provided by the source.

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

Company Name: Mascot Truck Parts

Source Address: 2799 Reeves Road, Plainfield, IN 46168

Permit No.: F063-35933-00074
Reviewer: Adam Wheat

PROCESS	Number of	Max. electrode	Max. electrode		EMISSION I	FACTORS*			EMI	SSIONS		HAPS
	Stations	consumption per	consumption per		(lb pollutant/l	b electrode)			(	(lbs/hr)		(lbs/hr)
WELDING		station (lbs/hr)	station (lbs/day)	PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Submerged Arc	1	0.1	2.4	0.036	0.011			0.004	0.001	0.000	0	0.001
Metal Inert Gas (MIG)(carbon steel)	1	0.5	12.0	0.0055	0.0005			0.003	0.000	0.000	0	0.000
	Number of	Max. Metal	Max. Metal		EMISSION F	FACTORS			EMI	SSIONS		HAPS
	Stations	Thickness	Cutting Rate	(lb poll	utant/1,000 ind	ches cut, 1" th	ick)**		(	(lbs/hr)		(lbs/hr)
FLAME CUTTING		Cut (in.)	(in./minute)	PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	2	2	12	0.1622	0.0005	0.0001	0.0003	0.467	0.001	0.000	0.001	0.003
EMISSION TOTALS												
Potential Emissions lbs/hr								0.47	0.00	0.00	0.00	0.00
Potential Emissions lbs/day			•		•			11.36	0.07	0.01	0.02	0.09
Potential Emissions tons/year								2.07	0.01	0.00	0.00	0.02

#### Methodology

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.

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

<sup>\*\*</sup>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 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

# Appendix A: Emissions Calculations Volatile Organic Compound (VOC) and Particulate Emissions From the Miscellaneous VOC Usage

Company Name: Mascot Truck Parts
Source Address: 2799 Reeves Road, Plainfield, IN 46168
Permit No.: F063-35933-00074

Reviewer: Adam Wheat

Coating / Material	Estimated Annual Usage (Container UOM)	Container Size (Converted to gal)	Estimated Annual Usage (gal)	Estimated Annual Operating Hours	Estimated Usage (gal/hr)	Density (Lb/Gal)	Wt % Volatile (Water, Exempt Solvents,& VOC)	Wt % Water & Exempt Solvents	Wt % VOC	Vol% Water & Exempt Solvents	Vol% Solids	VOC (lb/gal less W & Exempt Solvents)	VOC (lb/ gal)	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (ton/yr)	Uncontrolled PM/ PM10 (lb/hr)	Uncontrolled PM/ PM10 (lb/day)	Uncontrolled PM/ PM10 (ton/yr)
CRC Super Degreaser	240	0.156	37.51	5000	0.008	11.08	100.00%	1.62%	98.38%	1.62%	0.00%	11.08	10.90	0.082	1.963	0.358	0.00	0.00	0.00
Marker Paint - Cambar	842	0.094	78.94	5000	0.016	7.50	81.20%	35.91%	45.30%	35.91%	18.80%	5.30	3.40	0.054	1.287	0.235	0.02	0.53	0.10
Oakite Cleaner / Rust Preventative	165	1.000	165.00	5000	0.033	6.62	90.00%	0.00%	90.00%	0.00%	5.00%	5.96	5.96	0.197	4.719	0.861	0.02	0.52	0.10
Loctite 271	148	0.066	9.77	5000	0.002	9.16	0.82%	0.00%	0.82%	0.00%	99.18%	0.08	0.08	1.47E-04	3.52E-03	6.43E-04		-	NA
Loctite 518	86	0.013	1.14	5000	0.000	9.16	4.00%	0.00%	4.00%	0.00%	96.00%	0.37	0.37	8.32E-05	2.00E-03	3.64E-04		-	NA
Loctite 680	92	0.066	6.07	5000	0.001	9.16	4.22%	0.00%	4.22%	0.00%	95.78%	0.39	0.39	4.69E-04	0.011	2.06E-03	-	-	NA
Loctite 277	125	0.066	8.25	5000	0.002	9.16	0.71%	0.00%	0.71%	0.00%	99.29%	0.07	0.07	1.07E-04	2.58E-03	4.70E-04	-	-	NA
Loctite 222MS	55	0.066	3.63	5000	0.001	8.75	0.19%	0.00%	0.19%	0.00%	99.80%	0.02	0.02	1.21E-05	2.90E-04	5.29E-05	-	-	NA
Loctite 242	36	0.066	2.38	5000	0.000	9.16	4.48%	0.00%	4.48%	0.00%	95.52%	0.41	0.41	1.95E-04	4.68E-03	8.54E-04	-	-	NA
Loctite 5699 Grey Silicone RTV Caulk	141	0.079	11.18	5000	0.002	12.50	3.31%	0.00%	3.31%	0.00%	96.69%	0.41	0.41	9.25E-04	0.022	4.05E-03	-	-	NA
Fastball Degreaser (Warsaw)	500	0.250	125.00	5000	0.025	7.91	96.25%	85.25%	11.00%	85.25%	3.75%	5.90	0.87	0.022	0.522	0.095	-	-	NA
TAP Magic Cutting Fluid	36	0.125	4.50	5000	0.001	10.87	98.92%	0.00%	98.90%	0.00%	1.08%	10.75	10.75	0.010	0.232	0.042	-	-	NA
Krylon Toughcoat Semiflat Black	120	0.094	11.28	5000	0.002	6.51	88.00%	34.00%	47.28%	40.72%	12.00%	5.19	3.08	0.007	0.167	0.030	0.00	0.04	0.01
Multan Marking Green Paint 39SY201	60	0.133	8.00	5000	0.002	7.50	10.00%	0.00%	10.00%	0.00%	90.00%	0.75	0.75	1.20E-03	0.029	0.005	0.01	0.26	0.05
WD40	100	1.000	100.00	5000	0.020	6.81	49.50%	0.00%	49.50%	0.00%	26.00%	3.37	3.37	0.067	1.618	0.295	0.07	1.65	0.30
CRC Brakleen	50	0.148	7.42	5000	0.001	8.91	90.00%	0.00%	90.00%	0.00%	0.00%	8.02	8.02	0.012	0.286	0.052	0.00	0.03	0.01
Domino I-270BK InkJet Printing Ink	12	0.218	2.62	5000	0.001	7.26	90.00%	0.00%	90.00%	0.00%	10.00%	6.53	6.53	3.42E-03	0.082	0.015	-	-	NA
Domino M-270 Make Up	12	0.218	2.62	5000	0.001	6.78	100.00%	0.00%	100.00%	0.00%	0.00%	6.78	6.78	3.55E-03	0.085	0.016	-	-	NA
Permatex Thread Sealant	52	0.110	5.72	5000	0.001	9.01	37.50%	0.00%	36.70%	0.00%	73.00%	3.31	3.31	3.78E-03	0.091	0.017	-	-	NA
Loctite Fix Fast Set Steel Putty	12	0.017	0.20	5000	0.000	21.71	0.30%	0.00%	0.30%	0.00%	70.00%	0.07	0.07	2.66E-06	0.000	0.000	-	-	NA
Dykem Die Layout Fluid	12	1.000	12.00	5000	0.002	7.50	93.24%	0.00%	93.24%	0.00%	6.76%	6.99	6.99	1.68E-02	0.403	0.074	-	-	NA
PPG AquaCron 880 (Latex Edge	0	1.000	0.00	5000	0.000	8.41	72.00%	0.00%	72.00%	0.00%	24.44%	6.06	6.06	0.000	0.000	0.000	-	-	NA
													Totals	0.48	11.53	2.10	0.13	3.04	0.56

#### METHODOLOGY

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % VOC) / (1-Volume % water and exempt solvents)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % VOC)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (b/gal) \* Gal of Material (gal/yr) \* Weight % VOC \* 1 yr/ (actual) hours of operation

Potential VOC Pounds per Day = Potential VOC Pounds per Hour \* (24 hr/day)

Potential VOC Tons per Year = Potential VOC Pounds per Day \* (365 day/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = "Ag of I Material (gal/yr) \* 1 yr/ (actual) hours of operation \* Pounds of VOC per Gallon coating (lb/gal) \* (1-Weight % Volatile) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

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

# Appendix A: Emission Calculations HAP Emission Calculations

Company Name: Mascot Truck Parts Source Address: 2799 Reeves Road, Plainfield, IN 46168 Permit No.: F063-35933-00074

Reviewer: Adam Wheat

Coating / Material	% Chromium Cmpds	Chromium Cmpds (lb/hr)	Chromium Cmpds (ton/yr)	% Glycol Ethers	Glycol Ethers (lb/hr)	Glycol Ethers (ton/yr)	% Perchlor- ethylene	Perchlor- ethylene (lb/hr)	Perchlor- ethylene (ton/yr)	% Ethylene Glycol	Ethylene Glycol (lb/hr)	Ethylene Glycol (ton/yr)	% Aceto- nitrile	Aceto- nitrile (lb/hr)	Aceto- nitrile (ton/yr)	% Xylene	Xylene (lb/hr)	Xylene (ton/yr)
CRC Super Degreaser	-	-			-	-	-	-	-	-	-	-	1.00%	0.001	0.004	-	-	-
Marker Paint - Cambar	-			1.47%	0.002	0.008	-	-	-	-	-	-		-		-		-
Oakite Cleaner / Rust Preventative	-	-	-	-	-	-		-	-	-	-	-	-		-	0.90%	0.002	0.009
Loctite 271	-	,	-	-	-	-	,	-	-	-	-	-	-			-		-
Loctite 518	-				-		-	-	-	4.00%	8.32E-05	3.64E-04		-		-		-
Loctite 680	-	-	-	-	-	-		-	-	-	-	-	-		-	-		-
Loctite 277	-		-	-	-	-		-	-	-	-	-	-			-		-
Loctite 222MS	-	-	-	-	-	-		-	-	-	-	-	-		-	-		-
Loctite 242	-	,	-	-	-	-	,	-	-	-	-	-	-			-		-
Loctite 5699 Grey Silicone RTV Caulk	-	-	-	-	-	-		-	-	-	-	-	-		-	-		-
Fastball Degreaser (Warsaw)	-	-	-	-	-	-		-	-	-	-	-	-		-	-		-
TAP Magic Cutting Fluid	-	,	-	-	-	-	,	-	-	-	-	-	-			-		-
Krylon Toughcoat Semiflat Black	-	-	-	-	-	-		-	-	-	-	-	-		-	-		-
Multan Marking Green Paint 39SY201	-		-	-	-	-	-	-	-	-	-	-		-	-		-	-
WD40	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
CRC Brakleen	-		-	-	-	-	95.00%	0.013	0.055	-	-	-		-	-		-	-
Domino I-270BK InkJet Printing Ink	10.000	0.038	0.166	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Domino M-270 Make Up	-	-	-	-	-	-		-	-	-	-	-	-		-	-		-
Permatex Thread Sealant			-	-	-	-	-	-	-	-	-	-		-	-		-	-
Loctite Fix Fast Set Steel Putty	-	,	-	-	-	-	,	-	-	-	-	-	-			-		-
Dykem Die Layout Fluid																		
PPG AquaCron 880 (Latex Edge		-	-	-	-	-	-	-	-	-	-	-		-	-	0.05%	0.00	0.00
Totals			0.166			0.01			0.06			3.64E-04			3.64E-03			0.01

Coating / Material	% Methyl Alcohol	Methyl Alcohol (lb/hr)	Methyl Alcohol (ton/yr)	% Ethyl- benzene	Ethyl- benzene (lb/hr)	Ethyl- benzene (ton/yr)	% Toluene	Toluene (lb/hr)	Toluene (ton/yr)
CRC Super Degreaser	-	-	-	-	-	-	-	-	-
Marker Paint - Cambar	-	-	-	-	-	-	11.27%	0.013	0.058
Oakite Cleaner / Rust Preventative	-	-	-	-	-	-		-	-
Loctite 271	-	-	-	-	-	-	-	-	-
Loctite 518		-	-	-		-	-	-	-
Loctite 680	,	-	,		,	-	-	,	-
Loctite 277		-	-	-		-	-	-	-
Loctite 222MS	-	-	-	-	-	-	•		-
Loctite 242	,	-	,		,	-	-	,	-
Loctite 5699 Grey Silicone RTV Caulk	-	-	-	-	-	-	•		-
Fastball Degreaser (Warsaw)	-	-	-	_	-	-	-	-	-
TAP Magic Cutting Fluid	-	-	-		-	-		-	-
Krylon Toughcoat Semiflat Black	-	-	-	0.10%	1.47E-05	6.43E-05	19.0%	0.003	0.012
Multan Marking Green Paint 39SY201	-	-	-	-	-	-	-	-	-
WD40	-	-	-	_	-	-	-	-	-
CRC Brakleen	-	-	-	-	-	-	-	-	-
Domino I-270BK InkJet Printing Ink	1.00	0.004	0.017		-	-	-	-	-
Domino M-270 Make Up	1.00	0.004	0.016	-	-	-	-	-	-
Permatex Thread Sealant	3.00	0.031	0.135						
Loctite Fix Fast Set Steel Putty	-	-	-	-	-	-	-	-	-
Dykem Die Layout Fluid									
PPG AquaCron 880 (Latex Edge	-	-	-	-	-	-	-	-	0.07
Totals			0.168	0.168 6.43E-05					

Total HAPs = 0.48 tons/yr
"Worst" single HAP = 0.168 tons/yr (methyl alcohol)

METHODOLOGY
Potential HAP Pounds per Hour = Pounds of HAP per Gallon coating (ib/gal) \* Gal of Material (gal/yr) \* Weight % HAP \* 1 yr/ (actual) hours of operation
Potential HAP Tons per Year = Potential HAP Pounds per hour \* (8760 hour/yr) \* (1 ton/2000 lbs)
\* Some coatings contain naphtha products which do not declare HAPs on the MSDS specifically related to that CAS, however, Table 3 to 40 CFR 63, Subpart IIII gives additional HAP information for coatings such as these and have been included here.

#### Appendix A: Emissions Calculations **Natural Gas Combustion Only**

MM BTU/HR <100

Company Name: Mascot Truck Parts

2799 Reeves Road, Plainfield, IN 46168 Source Address: F063-35933-00074

Permit No.: Reviewer: Adam Wheat

HHV

Heat Input Capacity mmBtu MMBtu/hr mmscf 10.20 1020

Potential Throughpo	ut
MMCF/yr	
87.6	

Emission	Total Heat Input
HVAC-1	1.00
HVAC-2	1.00
HVAC-3	1.00
HVAC-4	1.00
HVAC-5	1.00
HVAC-6	1.00
HVAC-7	1.00
HVAC-9	1.60
HVAC-10	1.60
TOTAL	10.20

				Pollutant			
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.08	0.33	0.33	0.03	4.38	0.24	3.68

<sup>\*</sup>PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

#### 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

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

#### Hazardous Air Pollutants (HAPs)

			HAPs - 0	Organics		
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.2E-05	5.3E-05	3.3E-03	0.08	1.5E-04	0.08

			HAPs	- Metals		
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.2E-05	4.8E-05	6.1E-05	1.7E-05	9.2E-05	2.4E-04
Methodology is the same as above.	Total HAPs	0.08				
The five highest organic and metal HA	0.08					

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

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

#### Greenhouse Gases (GHGs)

		Greenhouse G	as
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	5,256	0.10	0.10
Summed Potential Emissions in tons/yr		5,256	
CO2e Total in tons/yr		5,287	

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64. Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O

Potential Emission ton/yr x N2O GWP (298).

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

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



We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Thomas W. Easterly

Commissioner

August 4, 2015

Mr. Steve Brown Mascot Truck Parts 2799 Reeves Road Plainfield, IN 46168

Re: Public Notice

**Mascot Truck Parts** 

Permit Level: New Source Construction and Federally Enforceable State Operating Permit

(FESOP)

Permit Number: 063-35933-00074

Dear Mr. Brown:

Enclosed is a copy of your draft New Source Construction and Federally Enforceable State Operating Permit (FESOP), Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Hendricks County Flyer in Avon, Indiana publish the abbreviated version of the public notice no later than August 8, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Plainfield-Guilford Township Public Library, 1120 Stafford Road in Plainfield, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Adam Wheat, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-8397 or dial (317) 233-8397.

Sincerely,

Vívian Haun

Vivian Haun Permits Branch Office of Air Quality

Enclosures PN Applicant Cover lette-2014. Dot4/10/14







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Michael R. Pence Governor

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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 3, 2015

Hendricks County Flyer 8109 Kingston Street Suite 500 Avon, IN 46123

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Mascot Truck Parts, Hendricks County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 8, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

# To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vívian Haun

Vivian Haun Permit Branch Office of Air Quality

Permit Level: New Source Construction and

Federally Enforceable State Operating Permit (FESOP)

Permit Number: 063-35933-00074

Enclosure PN Newspaper.dot 6/13/2013







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Michael R. Pence Governor Thomas W. Easterly

Commissioner

August 4, 2015

To: Plainfield-Guilford Township Public Library

From: Matthew Stuckey, Branch Chief

Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air

**Permit** 

Applicant Name: Mascot Truck Parts Permit Number: 063-35933-00074

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures PN Library.dot 6/13/2013







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Michael R. Pence Governor

Thomas W. Easterly

Commissioner

#### **Notice of Public Comment**

August 4, 2015 Mascot Truck Parts 063-35933-00074

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure PN AAA Cover.dot 6/13/13





# Mail Code 61-53

IDEM Staff	VHAUN 8/4/201	5		
	Mascot Truck Pa	rts 063-35933-00074 DRAFT		AFFIX STAMP
Name and		Indiana Department of Environmental	Type of Mail:	HERE IF
address of		Management		USED AS
Sender		Office of Air Quality – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate	MAILING ONLY	OF MAILING
		Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
1		Steve Brown Mascot Truck Parts 2799 Reeves Road Plainfield IN 46168 (Source CAA	TS)								Remarks
2		Dwight Treen Plant Manager Mascot Truck Parts 2799 Reeves Road Plainfield IN 46168 (RO CAATS)									
3		Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party)									
4		Hendricks County Commissioners 355 S Washington Danville IN 46122 (Local Official)									
5		Plainfield Public Library 1120 Stafford Rd Plainfield IN 46168-2230 (Library)									
6		Betty Bartley P.O. Box 149 Danville IN 46122 (Affected Party)									
7		Plainfileld Town Council and Town Manager P.O. Box 65 Plainfield IN 46168 (Local Official)									
8		Hendricks County Health Department 355 S Washington Street, Suite 210 Danville IN 46122-1759 (Health Department)									
9		Cheryl Wise Wilcox Environmental Engineering 5757 W 74th St Indianapolis IN 46278-1755 (Consultant)									
10		Mr. John Wellspring Wilcox Environmental Engineering 5757 W 74th Street Indianapolis IN 46278 (Consultant)									
11		FFI IN Plainfield IX, LLC 10350 Bren Road W Hopkins MN 55343 (Affected Party)									
12		Genuine Parts Company 2999 Circle 75 Parkway Atlanta GA 30339 (Affected Party)									
13		Airwest, LLC 3750 N Lake Shore Drive#7 Chicago IL 60613 (Affected Party)									
14		WPT Reeves Road, LLC 4350 Baker Road, Suite 400 Minnesota MN 55343 (Affected Party)									
15		Whitaker Properties, LLC 2560 W Philadelphia Street Ontario CA 91761 (Affected Party)									

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

# Mail Code 61-53

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	Mascot Truck Pa	rts 063-35933-00074 DRAFT	AFFIX STAMP	
Name and		Indiana Department of Environmental	Type of Mail:	HERE IF
address of		Management		USED AS
Sender		Office of Air Quality – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate	MAILING ONLY	OF MAILING
		Indianapolis, IN 46204	MAIEMO SILE	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		US Industrial Reit III - Gateway 9830 Colonnade Blvd Ste 600 San Antonio TX 78230	(Affected Par	rty)							
2		US Industrial Relt III - Gateway 2801 Airwest Blvd San Antonio TX 78230 (Affected	Party)								
3											
4											
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15											

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