



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a  
Federally Enforceable Operating Permit (FESOP)

for Commercial Finishing Corporation

FESOP Renewal No.: F097-36256-00674

The Indiana Department of Environmental Management (IDEM) has received an application from Commercial Finishing Corporation located at 7199 English Ave., Indianapolis, IN 46219 for a renewal of its FESOP issued on June 16, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Commercial Finishing Corporation to continue to operate its existing source.

This draft FESOP Renewal does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

This draft FESOP Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Irvington Branch  
5625 E. Washington St.  
Indianapolis, IN 46219

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

### 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 F097-36256-00674 in all correspondence.

**Comments should be sent to:**

Nicholas Eilerman  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5373  
Or dial directly: (317) 317-234-5373  
Fax: (317) 232-6749 attn: Nicholas Eilerman  
E-mail: neilerma@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: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**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 Nicholas Eilerman of my staff at the above address.



Iryn Callung, Section Chief  
Permits Branch  
Office of Air Quality



Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

DRAFT

# Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Commercial Finishing Corporation  
7199 English Ave.  
Indianapolis, Indiana 46219**

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

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

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

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

Operation Permit No.: F097-36256-00674	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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Surface Coating of Plastic Parts for Business Machines [40 CFR, Part 60, Subpart TTT]

## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary a miscellaneous metal and plastic parts surface coating operation for automotive, HVAC, medical, military, heavy machinery, computer industries.

Source Address:	7199 English Ave., Indianapolis, Indiana 46219
General Source Phone Number:	(317) 267-0337
SIC Code:	3479 (Coating, Engraving, etc)
County Location:	Marion, Warren Township (Outside Center, Perry, and Wayne Townships)
Source Location Status:	
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Seven (7) spray paint booths, with a bottleneck throughput of 127,051.20 square feet per day (due to the washer), consisting of the following:
  - (1) One (1) spray paint booth, identified as PB #1, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S6.
  - (2) One (1) spray paint booth, identified as PB #2, used for touch-up only, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S7.
  - (3) One (1) spray paint booth, identified as PB #3, used for re-work (i.e. sanding and recoating) and miscellaneous metal and plastic finishing, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S9.
  - (4) One (1) spray paint booth, identified as PB #4, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S10.
  - (5) One (1) spray paint booth, identified as PB#5, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal

or plastic panels, using dry filters for overspray control, and exhausting to stack S14.

- (6) One (1) spray paint booth, identified as PB#6, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S15.
- (7) One (1) spray paint booth, identified as PB#7, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S16.

Under 40 CFR 60, Subpart TTT, PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7 are considered part of an affected source.

- (b) One (1) powder coating booth, identified as PC#1, constructed in 2011, equipped with two (2) electrostatic sprays gun for surface coating 5' x 10" sheet metal panels, with a maximum capacity of 63,525.60 square feet per day, with a collection hopper and using cartridge filters for overspray control, and exhausting to stack S13.
- (c) One (1) five-stage washer, identified as FSW#1, constructed in 2011, with two (2) heat exchangers manifolded together, consisting of:
  - (1) Stage #1 – a heater with a maximum capacity of 3.00 MMBtu/hr and using 2,173 gallons of Alkaline Solution, with no control, and exhausting to stack S3.
  - (2) Stage #2 – an 836-gallon rinse tank, exhausting to stack S2.
  - (3) Stage #3 – a heater with a maximum capacity of 3.96 MMBtu/hr, and 2,255 gallons of Phosphate solution, with no control, and exhausting to stack S3.
  - (4) Stage #4 – an 836-gallon rinse tank, exhausting to stack S4.
  - (5) Stage #5 – an 836-gallon rinse tank.

Metal is sent through this washer before being sent to the spray paint booths, therefore, this washer is the bottleneck for this source.

- (d) One (1) makeup air unit, identified as MU#1, constructed in 2011, with a maximum capacity of 7.29 MMBtu/hr, with no control, and exhausting to stack S1.
- (e) One (1) dry-off oven, identified as DO#1, constructed in 2011, with a maximum capacity of 1.20 MMBtu/hr, with no control, and exhausting to stack S5.
- (f) One (1) cure oven, identified as CO#1, constructed in 2011, with a maximum capacity of 3.20 MMBtu/hr, with no control, and exhausting to stack S8.
- (g) One (1) batch oven, identified as BO#1, constructed in 2011, with a maximum capacity of 0.40 MMBtu/hr, with no control, and exhausting to stack S11.
- (h) One (1) paint/chemical storage room, identified as PR#1, constructed in 2011, with no control, exhausting to stack S12.
- (i) Two (1) natural gas fired batch oven, identified as BO#, constructed in 2013, with a maximum capacity of 0.40 MMBtu/hr, with no control, and exhausting to stack.

- (j) One (1) natural gas fired batch oven, identified as BO#3, constructed in 2013, with a maximum capacity of 1.00 MMBtu/hr, with no control, and exhausting to stack S18.

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) Combustion related activities, including the following:
  - (1) Space heaters, process heaters, or boilers using the following fuels:  
Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour
  - (2) Combustion source flame safety purging on startup.
- (b) The following VOC and HAP storage containers: Vessels storing the following:  
Lubricating Oils
- (c) Production related activities including the following:
  - (1) Cleaners and solvents characterized as follows where the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per 12 months.
- (d) Water-based activities including the following: Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs
- (e) Repair activities, including the following: Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: Purging of gas lines

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

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, F097-36256-00674, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

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

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

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

- (A) A description of the emergency;

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

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

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

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

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

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- (a) All terms and conditions of permits established prior to F097-36256-00674 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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

B.16 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.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

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

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Overall Source Limit [326 IAC 2-8]**

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

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.2 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 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.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Stack Height [326 IAC 1-7]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the

information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

---

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

---

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

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

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

---

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

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

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

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

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

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

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

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

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

---

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

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

---

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

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

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
  - (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:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

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

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

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

**Emissions Unit Description:**

- (a) Seven (7) spray paint booths, with a bottleneck throughput of 127,051.20 square feet per day (due to the washer), consisting of the following:
  - (1) One (1) spray paint booth, identified as PB #1, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S6.
  - (2) One (1) spray paint booth, identified as PB #2, used for touch-up only, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S7.
  - (3) One (1) spray paint booth, identified as PB #3, used for re-work (i.e. sanding and recoating) and miscellaneous metal and plastic finishing, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S9.
  - (4) One (1) spray paint booth, identified as PB #4, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S10.
  - (5) One (1) spray paint booth, identified as PB#5, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S14.
  - (6) One (1) spray paint booth, identified as PB#6, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S15.
  - (7) One (1) spray paint booth, identified as PB#7, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S16.

Under 40 CFR 60, Subpart TTT, PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7 are considered part of an affected source.

- (b) One (1) powder coating booth, identified as PC#1, constructed in 2011, equipped with two (2) electrostatic spray guns for surface coating 5' x 10" sheet metal or plastic panels, with a maximum capacity of 63,525.60 square feet per day, with a collection hopper and using cartridge filters for overspray control, exhausting to stack S13.
- (c) One (1) five-stage washer, identified as FSW#1, constructed in 2011, with two (2) heat exchangers manifolded together, consisting of:
  - (1) Stage #1 – a heater with a maximum capacity of 3.00 MMBtu/hr and using 2,173 gallons of Alkaline Solution, with no control, and exhausting to stack S3.
  - (2) Stage #2 – an 836-gallon rinse tank, exhausting to stack S2.
  - (3) Stage #3 – a heater with a maximum capacity of 3.96 MMBtu/hr, and 2,255 gallons of

Phosphate solution, with no control, and exhausting to stack S3.

(4) Stage #4 – an 836-gallon rinse tank, exhausting to stack S4.

(5) Stage #5 – an 836-gallon rinse tank.

Metal is sent through this washer before being sent to the spray paint booths, therefore, this washer is the bottleneck for this source.

(d) One (1) makeup air unit, identified as MU#1, constructed in 2011, with a maximum capacity of 7.29 MMBtu/hr, with no control, and exhausting to stack S1.

(e) One (1) dry-off oven, identified as DO#1, constructed in 2011, with a maximum capacity of 1.20 MMBtu/hr, with no control, and exhausting to stack S5.

(f) One (1) cure oven, identified as CO#1, constructed in 2011, with a maximum capacity of 3.20 MMBtu/hr, with no control, and exhausting to stack S8.

(g) One (1) batch oven, identified as BO#1, constructed in 2011, with a maximum capacity of 0.40 MMBtu/hr, with no control, and exhausting to stack S11.

(i) Two (1) natural gas fired batch oven, identified as BO#, constructed in 2013, with a maximum capacity of 0.40 MMBtu/hr, with no control, and exhausting to stack.

(j) One (1) natural gas fired batch oven, identified as BO#3, constructed in 2013, with a maximum capacity of 1.00 MMBtu/hr, with no control, and exhausting to stack S18.

(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 [326 IAC 6.5-1-2(a)]

- (a) Pursuant to 326 IAC 6.5-1-2(h), each of the spray paint booths (PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the powder coating booth (PC#1) and the natural gas combustion units (Stage #1 heater, Stage #2 heater, MU#1, DO#1, CO#1, BO#1, BO#2, and BO#3) shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.

#### D.1.2 FESOP Limits [326 IAC 2-8-4][326 IAC 2-4.1]

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

- (a) The total VOC input at PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7, including VOC cleaners and solvents, shall not exceed 80 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The total input of any single HAP at PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7, shall not exceed 9.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total input of the combined HAPs at PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7, shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

#### D.1.3 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 PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7, the Permittee shall comply with the following:

- (1) 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:
  - (A) 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:
    - (i) lacks color or opacity; and
    - (ii) is transparent and uses the undercoat as a reflectant base or undertone color.
  - (B) 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).
  - (C) 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:
    - (i) temperatures consistently above ninety-five (95) degrees Celsius;
      - (a) detergents;
      - (b) abrasive or scouring agents;
      - (c) solvents;
      - (d) corrosive atmospheres;
      - (e) outdoor weather at all times; or

- (f) similar environmental conditions.
- (D) 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.
- (2) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
  - (A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (B) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (D) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (E) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

#### D.1.4 Volatile Organic Compound (VOC) Limitations [326 IAC 8-1-6]

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In order to render the requirements of 326 IAC 8-1-6 ((VOC Rules: General Reduction Requirements for New Facilities) not applicable, the Permittee shall comply with the following:

- (a) When coating plastic parts in PB#1, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) When coating plastic parts in PB#2, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) When coating plastic parts in PB#3, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) When coating plastic parts in PB#4, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (e) When coating plastic parts in PB#5, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

- (f) When coating plastic parts in PB#6, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (g) When coating plastic parts in PB#7, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these VOC input limitations shall limit the VOC emissions from each booth to less than 25 tons per tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 not applicable to each booth.

#### **D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

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

#### **D.1.6 Particulate Control**

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In order to demonstrate compliance with Condition D.1.1, particulate from the dry filters and cartridge filters for particulate control shall be in operation and control emissions from seven (7) paint spray booths (PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7) and the powder coating booth (PC#1) at all times when one or more of the abovementioned emission units are in operation.

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

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Compliance with the VOC and HAPs content and limits contained in Conditions D.1.2, D.1.3, and D.1.4 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 and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### **D.1.8 Dry Filter Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, S6, S7, S9, S10, S14, S15, and S16, while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the sides of the building and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

### **D.1.9 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.2, D.1.3 and D.1.4, the Permittee shall maintain the records, in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Condition D.1.2 and D.1.4, and the VOC emission limit established in Condition D.1.3. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
- (1) The VOC and HAP content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The monthly cleanup solvent usage.
  - (4) The total VOC and HAP (single and combined) input for each month.
  - (5) The total VOC and HAP (single and combined) input for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

### **D.1.10 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Conditions D.1.2, D.1.4 shall be submitted using the reporting form located at the end of this permit, or its equivalent not later than thirty (30) days following the end of each calendar quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

**SECTION E.1**

**NSPS**

Emissions Unit Operation:

- (a) Seven (7) spray paint booths, with a bottleneck throughput of 127,051.20 square feet per day (due to the washer), consisting of the following:
- (1) One (1) spray paint booth, identified as PB #1, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S6.
  - (2) One (1) spray paint booth, identified as PB #2, used for touch-up only, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S7.
  - (3) One (1) spray paint booth, identified as PB #3, used for re-work (i.e. sanding and recoating) and miscellaneous metal and plastic finishing, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S9.
  - (4) One (1) spray paint booth, identified as PB #4, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S10.
  - (5) One (1) spray paint booth, identified as PB#5, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S14.
  - (6) One (1) spray paint booth, identified as PB#6, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S15.
  - (7) One (1) spray paint booth, identified as PB#7, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S16.

Under 40 CFR 60, Subpart TTT, PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7 are considered part of an affected source.

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

**New Source Performance Standards (NSPS) Requirements: Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines [326 IAC 2-8-4(1)]**

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, except as otherwise specified in 40 CFR 60, Subpart TTT.

- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 New Source Performance Standards (NSPS) Requirements: Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines [40 CFR Part 60, Subpart TTT] [326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart TTT (included as Attachment A of this operating permit), which are incorporated by reference as 326 IAC 12, except as otherwise specified in 40 CFR Part 60, Subpart TTT:

Applicable portions of the NSPS are the following:

- (1) 40 CFR 60.720
- (2) 40 CFR 60.721
- (3) 40 CFR 60.722
- (4) 40 CFR 60.723
- (5) 40 CFR 60.724
- (6) 40 CFR 60.725
- (7) 40 CFR 60.726.

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

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

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12</li></ul> |
|--|

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

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

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

Page 2 of 2

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

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Commercial Finishing Corporation  
 Source Address: 7199 English Avenue, Indianapolis, Indiana 46219  
 FESOP Permit No.: F097-36256-00674  
 Facility: Seven (7) spray paint booths PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7)  
 Parameter: VOC, single and combined HAP Input  
 Limit: (a) total VOC input at the seven (7) paint spray booths, including VOC cleaners and solvents, shall not exceed 80 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.  
 (b) total input of any single hazardous air pollutant (HAP) at the seven (7) paint spray booths shall not exceed 9.00 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.  
 (c) total input of the combined hazardous air pollutants (HAPs) at the seven (7) paint spray booths shall not exceed 24.00 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

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

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

\*List the single HAP with the greatest emission rate

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

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674  
Facility: PB#1  
Parameter: VOC emissions  
Limit: Total VOC input, including VOC cleaners and solvents, shall be less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674  
Facility: PB#2  
Parameter: VOC emissions  
Limit: Total VOC input, including VOC cleaners and solvents, shall be less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674  
Facility: PB#3  
Parameter: VOC emissions  
Limit: Total VOC input, including VOC cleaners and solvents, shall be less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674  
Facility: PB#4  
Parameter: VOC emissions  
Limit: Total VOC input, including VOC cleaners and solvents, shall be less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674  
Facility: PB#5  
Parameter: VOC emissions  
Limit: Total VOC input, including VOC cleaners and solvents, shall be less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674  
Facility: PB#6  
Parameter: VOC emissions  
Limit: Total VOC input, including VOC cleaners and solvents, shall be less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674  
Facility: PB#7  
Parameter: VOC emissions  
Limit: Total VOC input, including VOC cleaners and solvents, shall be less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

Source Name: Commercial Finishing Corporation  
Source Address: 7199 English Ave., Indianapolis, Indiana 46219  
FESOP Permit No.: F097-36256-00674

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

Page 1 of 2

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

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

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

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

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

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

## Attachment A

### Federally Enforceable State Operating Permit (FESOP) No: 097-36256-00674

[Downloaded from the eCFR on October 11, 2013]

#### Electronic Code of Federal Regulations

#### Title 40: Protection of Environment

#### PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

#### Subpart TTT—Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines

##### **§ 60.720** *Applicability and designation of affected facility.*

(a) The provisions of this subpart apply to each spray booth in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch-up coats.

(b) This subpart applies to any affected facility for which construction, modification, or reconstruction begins after January 8, 1986.

##### **§ 60.721** *Definitions.*

(a) As used in this subpart, all terms not defined herein shall have the meaning given them in the Act or in subpart A of this part.

*Business machine* means a device that uses electronic or mechanical methods to process information, perform calculations, print or copy information, or convert sound into electrical impulses for transmission, such as:

- (1) Products classified as typewriters under SIC Code 3572;
- (2) Products classified as electronic computing devices under SIC Code 3573;
- (3) Products classified as calculating and accounting machines under SIC Code 3574;
- (4) Products classified as telephone and telegraph equipment under SIC Code 3661;
- (5) Products classified as office machines, not elsewhere classified, under SIC Code 3579; and
- (6) Photocopy machines, a subcategory of products classified as photographic equipment under SIC code 3861.

*Coating operation* means the use of a spray booth for the application of a single type of coating (e.g., prime coat); the use of the same spray booth for the application of another type of coating (e.g., texture coat) constitutes a separate coating operation for which compliance determinations are performed separately.

*Coating solids applied* means the coating solids that adhere to the surface of the plastic business machine part being coated.

*Color coat* means the coat applied to a part that affects the color and gloss of the part, not including the prime coat or texture coat. This definition includes fog coating, but does not include conductive sensitizers or electromagnetic interference/radio frequency interference shielding coatings.

*Conductive sensitizer* means a coating applied to a plastic substrate to render it conductive for purposes of electrostatic application of subsequent prime, color, texture, or touch-up coats.

*Electromagnetic interference/radio frequency interference (EMI/RFI) shielding coating* means a conductive coating that is applied to a plastic substrate to attenuate EMI/RFI signals.

*Fog coating* (also known as mist coating and uniforming) means a thin coating applied to plastic parts that have molded-in color or texture or both to improve color uniformity.

*Nominal 1-month period* means either a calendar month, 30-day month, accounting month, or similar monthly time period that is established prior to the performance test (i.e., in a statement submitted with notification of anticipated actual startup pursuant to 40 CFR 60.7(2)).

*Plastic parts* means panels, housings, bases, covers, and other business machine components formed of synthetic polymers.

*Prime coat* means the initial coat applied to a part when more than one coating is applied, not including conductive sensitizers or electromagnetic interference/radio frequency interference shielding coatings.

*Spray booth* means the structure housing automatic or manual spray application equipment where a coating is applied to plastic parts for business machines.

*Texture coat* means the rough coat that is characterized by discrete, raised spots on the exterior surface of the part. This definition does not include conductive sensitizers or EMI/RFI shielding coatings.

*Touch-up coat* means the coat applied to correct any imperfections in the finish after color or texture coats have been applied. This definition does not include conductive sensitizers or EMI/RFI shielding coatings.

*Transfer efficiency* means the ratio of the amount of coating solids deposited onto the surface of a plastic business machine part to the total amount of coating solids used.

*VOC emissions* means the mass of VOC's emitted from the surface coating of plastic parts for business machines expressed as kilograms of VOC's per liter of coating solids applied (i.e., deposited on the surface).

(b) All symbols used in this subpart not defined below are given meaning in the Act or subpart A of this part.

$D_c$  =density of each coating as received (kilograms per liter)

$D_d$  =density of each diluent VOC (kilograms per liter)

$L_c$  =the volume of each coating consumed, as received (liters)

$L_d$  =the volume of each diluent VOC added to coatings (liters)

$L_s$  =the volume of coating solids consumed (liters)

$M_d$  =the mass of diluent VOC's consumed (kilograms)

$M_c$  =the mass of VOC's in coatings consumed, as received (kilograms)

$N$  =the volume-weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter)

$T$  =the transfer efficiency for each type of application equipment used at a coating operation (fraction)

$T_{avg}$  =the volume-weighted average transfer efficiency for a coating operation (fraction)

$V_s$  =the proportion of solids in each coating, as received (fraction by volume)

$W_o$  =the proportion of VOC's in each coating, as received (fraction by weight)

[53 FR 2676, Jan. 29, 1988, as amended at 54 FR 25459, June 15, 1989]

**§ 60.722 Standards for volatile organic compounds.**

(a) Each owner or operator of any affected facility which is subject to the requirements of this subpart shall comply with the emission limitations set forth in this section on and after the date on which the initial performance test, required by §§ 60.8 and 60.723 is completed, but not later than 60 days after achieving the maximum production rate at which the affected facility will be operated, or 180 days after the initial startup, whichever date comes first. No affected facility shall cause the discharge into the atmosphere in excess of:

(1) 1.5 kilograms of VOC's per liter of coating solids applied from prime coating of plastic parts for business machines.

(2) 1.5 kilograms of VOC's per liter of coating solids applied from color coating of plastic parts for business machines.

(3) 2.3 kilograms of VOC's per liter of coating solids applied from texture coating of plastic parts for business machines.

(4) 2.3 kilograms of VOC's per liter of coatings solids applied from touch-up coating of plastic parts for business machines.

(b) All VOC emissions that are caused by coatings applied in each affected facility, regardless of the actual point of discharge of emissions into the atmosphere, shall be included in determining compliance with the emission limits in paragraph (a) of this section.

**§ 60.723 Performance tests and compliance provisions.**

(a) Section 60.8 (d) and (f) do not apply to the performance test procedures required by this section.

(b) The owner or operator of an affected facility shall conduct an initial performance test as required under § 60.8(a) and thereafter a performance test each nominal 1-month period for each affected facility according to the procedures in this section.

(1) The owner or operator shall determine the composition of coatings by analysis of each coating, as received, using Method 24, from data that have been determined by the coating manufacturer using Method 24, or by other methods approved by the Administrator.

(2) The owner or operator shall determine the volume of coating and the mass of VOC used for dilution of coatings from company records during each nominal 1-month period. If a common coating distribution system serves more than one affected facility or serves both affected and nonaffected spray booths, the

owner or operator shall estimate the volume of coatings used at each facility by using procedures approved by the Administrator.

(i) The owner or operator shall calculate the volume-weighted average mass of VOC's in coatings emitted per unit volume of coating solids applied (N) at each coating operation [i.e., for each type of coating (prime, color, texture, and touch-up) used] during each nominal 1-month period for each affected facility. Each 1-month calculation is considered a performance test. Except as provided in paragraph (b)(2)(iii) of this section, N will be determined by the following procedures:

(A) Calculate the mass of VOC's used ( $M_o + M_d$ ) for each coating operation during each nominal 1-month period for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} M_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

where n is the number of coatings of each type used during each nominal 1-month period and m is the number of different diluent VOC's used during each nominal 1-month period. ( $\sum L_{dj} D_{dj}$  will be 0 if no VOC's are added to the coatings, as received.)

(B) Calculate the total volume of coating solids consumed ( $L_s$ ) in each nominal 1-month period for each coating operation for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n L_{ci} V_{si}$$

where n is the number of coatings of each type used during each nominal 1-month period.

(C) Select the appropriate transfer efficiency (T) from table 1 for each type of coating applications equipment used at each coating operation. If the owner or operator can demonstrate to the satisfaction of the Administrator that transfer efficiencies other than those shown are appropriate, the Administrator will approve their use on a case-by-case basis. Transfer efficiency values for application methods not listed below shall be approved by the Administrator on a case-by-case basis. An owner or operator must submit sufficient data for the Administrator to judge the validity of the transfer efficiency claims.

(D) Where more than one application method is used within a single coating operation, the owner or operator shall determine the volume of each coating applied by each method through a means acceptable to the Administrator and compute the volume-weighted average transfer efficiency by the following equation:

$$T_{avg} = \frac{\sum_{i=1}^n \sum_{k=1}^p L_{cik} V_{sik} T_k}{L_s}$$

TABLE 1—TRANSFER EFFICIENCIES

Application methods	Transfer efficiency	Type of coating
Air atomized spray	0.25	Prime, color, texture, touch-up, and fog coats.
Air-assistd airless spray	.40	Prime and color coats.
Electrostatic air spray	.40	Do.

where n is the number of coatings of each type used and p is the number of application methods used.

(E) Calculate the volume-weighted average mass of VOC's emitted per unit volume of coating solids applied (N) during each nominal 1-month period for each coating operation for each affected facility by the following equation:

$$N = \frac{M_o + M_d}{L_s T_{avg}}$$

( $T_{avg} = T$  when only one type of coating operation occurs).

(ii) Where the volume-weighted average mass of VOC's emitted to the atmosphere per unit volume of coating solids applied (N) is less than or equal to 1.5 kilograms per liter for prime coats, is less than or equal to 1.5 kilograms per liter for color coats, is less than or equal to 2.3 kilograms per liter for texture coats, and is less than or equal to 2.3 kilograms per liter for touch-up coats, the affected facility is in compliance.

(iii) If each individual coating used by an affected facility has a VOC content (kg VOC/l of solids), as received, which when divided by the lowest transfer efficiency at which the coating is applied for each coating operation results in a value equal to or less than 1.5 kilograms per liter for prime and color coats and equal to or less than 2.3 kilograms per liter for texture and touch-up coats, the affected facility is in compliance provided that no VOC's are added to the coatings during distribution or application.

(iv) If an affected facility uses add-on controls to control VOC emissions and if the owner or operator can demonstrate to the Administrator that the volume-weighted average mass of VOC's emitted to the atmosphere during each nominal 1-month period per unit volume of coating solids applied (N) is within each of the applicable limits expressed in paragraph (b)(2)(ii) of this section because of this equipment, the affected facility is in compliance. In such cases, compliance will be determined by the Administrator or a case-by-case basis.

[53 FR 2676, Jan. 29, 1988, as amended at 65 FR 61778, Oct. 17, 2000]

**§ 60.724 Reporting and recordkeeping requirements.**

(a) The reporting requirements of § 60.8(a) apply only to the initial performance test. Each owner or operator subject to the provisions of this subpart shall include the following data in the report of the initial performance test required under § 60.8(a):

(1) Except as provided for in paragraph (a)(2) of this section, the volume-weighted average mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) for the initial nominal 1-month period for each coating operation from each affected facility.

(2) For each affected facility where compliance is determined under the provisions of § 60.723(b)(2)(iii), a list of the coatings used during the initial nominal 1-month period, the VOC content of each coating calculated from data determined using Method 24, and the lowest transfer efficiency at which each coating is applied during the initial nominal 1-month period.

(b) Following the initial report, each owner or operator shall:

(1) Report the volume-weighted average mass of VOC's per unit volume of coating solids applied for each coating operation for each affected facility during each nominal 1-month period in which the facility is not in compliance with the applicable emission limits specified in § 60.722. Reports of noncompliance shall be submitted on a quarterly basis, occurring every 3 months following the initial report; and

(2) Submit statements that each affected facility has been in compliance with the applicable emission limits specified in § 60.722 during each nominal 1-month period. Statements of compliance shall be submitted on a semiannual basis.

(c) These reports shall be postmarked not later than 10 days after the end of the periods specified in § 60.724(b)(1) and § 60.724(b)(2).

(d) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each coating operation for each affected facility as specified in 40 CFR 60.7(d).

(e) Reporting and recordkeeping requirements for facilities using add-on controls will be determined by the Administrator on a case-by-case basis.

[53 FR 2676, Jan. 29, 1988, as amended at 65 FR 61778, Oct. 17, 2000]

**§ 60.725 Test methods and procedures.**

(a) The reference methods in appendix A to this part except as provided under § 60.8(b) shall be used to determine compliance with § 60.722 as follows:

(1) Method 24 for determination of VOC content of each coating as received.

(2) For Method 24, the sample must be at least a 1-liter sample in a 1-liter container.

(b) Other methods may be used to determine the VOC content of each coating if approved by the Administrator before testing.

**§ 60.726 Delegation of authority.**

(a) In delegating implementation and enforcement authority to a State under section 111(c) of the Act, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.

(b) Authorities which will not be delegated to the States:

Section 60.723(b)(1)

Section 60.723(b)(2)(i)(C)

Section 60.723(b)(2)(iv)

Section 60.724(e)

Section 60.725(b)

[53 FR 2676, Jan. 29, 1988, as amended at 53 FR 19300, May 27, 1988]

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

Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit Renewal (FESOP)

**Source Background and Description**

<b>Source Name:</b>	<b>Commercial Finishing Corporation</b>
<b>Source Location:</b>	<b>7199 English Avenue, Indianapolis, Indiana 46219</b>
<b>County:</b>	<b>Marion, Warren Township</b>
<b>SIC Code:</b>	<b>3479 (Coating, Engraving, etc. Not elsewhere Classified)</b>
<b>Permit Renewal No.:</b>	<b>F 097-36256-00674</b>
<b>Permit Reviewer:</b>	<b>Nicholas Eilerman</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Commercial Finishing Corporation relating to the operation of a miscellaneous metal and plastic parts surface coating operation for automotive, HVAC, medical, military, heavy machinery, computer industries. On September 10, 2015, Commercial Finishing Corporation submitted an application to the OAQ requesting to renew its operating permit. Commercial Finishing Corporation was issued a FESOP F 097-30171-00674 on June 16, 2011.

**Source Definition**

There are several Commercial Finishing Corporation plants:

- (a) Commercial Finishing Corp (Plant ID: 097-00178) is located at 1125 Brookside Avenue, Ste B, Indianapolis, Indiana. (Title V source)
- (b) Commercial Finishing Corp. (Plant ID: 097-00179) is located at 4001 East 26th Street, Indianapolis, Indiana. (MSOP source)
- (c) Commercial Finishing Corp. (Plant ID: 097-00674) is located at 7199 English Avenue, Indianapolis, Indiana. (FESOP source)

Commercial Finishing (Plant ID 097-00178) is located 2.75 miles from Commercial Finishing's (Plant ID 097-00179). Commercial Finishing (Plant ID (097-00674) is 7.23 miles from Commercial Finishing (Plant ID 097-00179). All three plants are located in Marion County. IDEM, OAQ has examined whether the plants are part of the same source. The term "source" is defined at 326 IAC 1-2-73.

In order for these plants to be considered one source, they must meet all three of the following criteria:

- (1) The plants must have common ownership or common control;
- (2) The plants must have the same two digit SIC code or a support relationship; and
- (3) The plants must be located on contiguous or adjacent properties.

IDEM has determined that these plants are not one major source based on the fact that the three (3) plants are not on contiguous or adjacent properties. Therefore, based on this evaluation these plants are still not considered one (1) major source, as defined by 326 IAC 2-7-1(22). This conclusion was initially determined under FESOP (097-30171-000674) on June 16, 2011.

<b>Permitted Emission Units and Pollution Control Equipment</b>
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The source consists of the following permitted emission units:

- (a) Seven (7) spray paint booths, with a bottleneck throughput of 127,051.20 square feet per day (due to the washer), consisting of the following:
    - (1) One (1) spray paint booth, identified as PB #1, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5' x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S6.
    - (2) One (1) spray paint booth, identified as PB #2, used for touch-up only, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S7.
    - (3) One (1) spray paint booth, identified as PB #3, used for re-work (i.e. sanding and recoating) and miscellaneous metal and plastic finishing, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S9.
    - (4) One (1) spray paint booth, identified as PB #4, constructed in 2011, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S10.
    - (5) One (1) spray paint booth, identified as PB#5, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S14.
    - (6) One (1) spray paint booth, identified as PB#6, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S15.
    - (7) One (1) spray paint booth, identified as PB#7, constructed in 2013, equipped with one (1) air atomization spray gun for surface coating 5" x 10" (50 sf) sheet metal or plastic panels, using dry filters for overspray control, and exhausting to stack S16.
- Under 40 CFR 60, Subpart TTT, PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7 are considered part of an affected source.
- (b) One (1) powder coating booth, identified as PC#1, constructed in 2011, equipped with two (2) electrostatic sprays gun for surface coating 5' x 10" sheet metal panels, with a maximum capacity of 63,525.60 square feet per day, with a collection hopper and using cartridge filters for overspray control, and exhausting to stack S13.
  - (c) One (1) five-stage washer, identified as FSW#1, constructed in 2011, with two (2) heat exchangers manifolded together, consisting of:
    - (1) Stage #1 – a heater with a maximum capacity of 3.00 MMBtu/hr and using 2,173 gallons of Alkaline Solution, with no control, and exhausting to stack S3.

- (2) Stage #2 – an 836-gallon rinse tank, exhausting to stack S2.
- (3) Stage #3 – a heater with a maximum capacity of 3.96 MMBtu/hr, and 2,255 gallons of Phosphate solution, with no control, and exhausting to stack S3.
- (4) Stage #4 – an 836-gallon rinse tank, exhausting to stack S4.
- (5) Stage #5 – an 836-gallon rinse tank.

Metal is sent through this washer before being sent to the spray paint booths, therefore, this washer is the bottleneck for this source.

- (d) One (1) makeup air unit, identified as MU#1, constructed in 2011, with a maximum capacity of 7.29 MMBtu/hr, with no control, and exhausting to stack S1.
- (e) One (1) dry-off oven, identified as DO#1, constructed in 2011, with a maximum capacity of 1.20 MMBtu/hr, with no control, and exhausting to stack S5.
- (f) One (1) cure oven, identified as CO#1, constructed in 2011, with a maximum capacity of 3.20 MMBtu/hr, with no control, and exhausting to stack S8.
- (g) One (1) batch oven, identified as BO#1, constructed in 2011, with a maximum capacity of 0.40 MMBtu/hr, with no control, and exhausting to stack S11.
- (h) One (1) paint/chemical storage room, identified as PR#1, constructed in 2011, with no control, exhausting to stack S12.
- (i) One (1) natural gas fired batch ovens, identified as BO#2, constructed in 2013, with a maximum capacity of 0.40 MMBtu/hr with no control, and exhausting to stacks S17.
- (j) One (1) natural gas fired batch ovens, identified as BO#., constructed in 2013, with a maximum capacity of 1.00 MMBtu/hr with no control, and exhausting to stacks S18.

<b>Insignificant Activities</b>
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The source also consists of the following insignificant activities:

- (a) Combustion related activities, including the following:
  - (1) Space heaters, process heaters, or boilers using the following fuels:  
Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour
  - (2) Combustion source flame safety purging on startup.
- (b) The following VOC and HAP storage containers: Vessels storing the following:  
Lubricating Oils
- (c) Production related activities including the following:
  - (1) Cleaners and solvents characterized as follows where the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per 12 months.

- (d) Water-based activities including the following: Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs
- (e) Repair activities, including the following: Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: Purging of gas lines

**Existing Approvals**

Since the issuance of the FESOP No. F097-36256-00674 on June 16, 2011, the source has constructed or has been operating under the following additional approvals:

- (a) Minor Permit Revision No. F097-32986-00674 issued on May 8, 2015.

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Marion County (Warren Township).

Pollutant	Designation
SO <sub>2</sub>	Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O <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>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.	

- (a) Ozone Standards  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marion County has

been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**  
 Marion 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.
- (c) **Other Criteria Pollutants**  
 Marion County (Warren Township) has been classified as attainment or unclassifiable in Indiana for all other regulated criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	144.41
PM <sub>10</sub>	144.41
PM <sub>2.5</sub>	144.91
SO <sub>2</sub>	0.05
NO <sub>x</sub>	8.78
VOC	228.84
CO	7.38
Single HAP	17.33
Total HAP	36.56

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC are equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-



Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub> ***	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . ***This source is not located in one of the townships considered as nonattainment for SO <sub>2</sub> .									

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

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

- (1) The total VOC input at PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7, including VOC cleaners and solvents, shall not exceed 80 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) The total input of any single HAP at PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7, shall not exceed 9.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (3) The total input of the combined HAPs at PB#1, PB#2, PB#3, PB#4, PB#5, PB#6, and PB#7, shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

These are existing limits and no change has been made in this renewal.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, total HAPs to less than twenty-five (25) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

- (b) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are limited to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (d) On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will

no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

### **Federal Rule Applicability**

#### Compliance Assurance Monitoring (CAM)

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

#### 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 for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat metal furniture.
- (b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) not coat automobiles or light-duty trucks.
- (c) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (326 IAC 12), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat pressure sensitive tape or labels.
- (d) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat large appliances.
- (e) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (326 IAC 12), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat metal coils.
- (f) The requirements of the New Source Performance Standard for The Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW (326 IAC 12), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat beverage cans.
- (g) The requirements of the New Source Performance Standard for Magnetic Tape Coating Facilities, 40 CFR 60, Subpart SSS (326 IAC 12), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat magnetic tapes.

- (h) The seven (7) paint booths (PB#1 through PB#7) are subject to the New Source Performance Standards for Industrial Surfacing Coating: Surface Coating of Plastic Parts for Business Machines (40 CFR 60, Subpart TTT) (326 IAC 12), because Commercial Finishing Corporation has painted plastic parts for business machines at their other locations in the past and anticipates that they could potentially surface coat plastic parts for business machines at this new operation.

The units subject to this rule include the following:

Seven (7) spray paint booths, identified as PB#1 through PB#7.

Applicable portions of the NSPS are the following:

- (1) 40 CFR 60.720
- (2) 40 CFR 60.721
- (3) 40 CFR 60.722
- (4) 40 CFR 60.723
- (5) 40 CFR 60.724
- (6) 40 CFR 60.725
- (7) 40 CFR 60.726

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the seven (7) paint booths (PB#1 through PB#7) except as otherwise specified in 40 CFR 60, Subpart TTT.

This is an existing requirement and is not being revised in this renewal.

The one (1) powder coating booth (PC#1) does not coat plastic parts. Therefore, PC#1 is not subject to the requirements of this NSPS.

- (i) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed renewal.

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

- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85), are not included for this proposed renewal, since the (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat automobiles or light duty trucks and are not located at a major source of HAPs.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Cans, 40 CFR 63.3480, Subpart KKKK (326 IAC 20-86), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat metal cans and are not located at a major source of HAPs.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) are not located at a major source of HAPs.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Large Appliances, 40 CFR 63.4080, Subpart NNNN (326 IAC 20-63), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder

- coating booth (PB#1 through PB#7 and PC#1) do not coat large appliances and are not located at a major source of HAPs.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP (326 IAC 20-81), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) are not located at a major source of HAPs.
  - (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63.4680, Subpart QQQQ (326 IAC 20-79), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not wood building products and are not located at a major source of HAPs.
  - (p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat metal furniture and are not located at a major source of HAPs.
  - (q) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Coil, 40 CFR 63.5080, Subpart SSSS (326 IAC 20-64), are not included for this proposed renewal, since the seven (7) paint booths and one (1) powder coating booth (PB#1 through PB#7 and PC#1) do not coat metal coil and are not located at a major source of HAPs.
  - (r) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63.7480, Subpart DDDDD (326 IAC 20-95), are not included for this proposed renewal, since the two batch ovens (BO#2 and BO#3) are not located at a major source of HAPs.
  - (s) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH), are not included in this renewal because the paint booths and the source do not conduct any paint stripping, autobody refinishing that encompasses motor vehicles or mobile equipment as defined in section 63.11180, or use coatings that contain compounds of chromium, lead, manganese, nickel, or cadmium. This source coats miscellaneous metal and plastic parts for the automotive, HVAC, medical, military, heavy machinery, computer industries, but none of the coatings used contain compounds of chromium, lead, manganese, nickel, or cadmium.
  - (t) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers at Area Sources, 40 CFR 63.11193, Subpart JJJJJ, are not included for this proposed renewal, since the two batch ovens (BO#2 and BO#3) are not boilers as defined in section 63.11237.
  - (u) There are no new National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed renewal

Compliance Assurance Monitoring (CAM)

- (v) 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 - Entire Source**

The following state rules are applicable to the proposed renewal:

- (a) 326 IAC 2-8-4 (FESOP)  
This renewal to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the Potential to Emit after Issuance section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The unlimited potential to emit of HAPs from the entire source is greater than ten (10) tons per year for any single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall continue to limit the potential to emit of HAPs from the entire source to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See Potential to Emit After Issuance Section above.
- (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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.  
  
The source is located in Warren Township and not in the area of Washington Township east of Fall Creek and the area of Franklin Township south of Thompson Road and east of Five Points Road.
  - (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 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Each of the units at the source is subject to 326 IAC 6.5. Therefore, pursuant to 326 IAC 6-3-1(c)(3), each unit is exempt from the requirements of 326 IAC 6-3, because they are otherwise subject to the more stringent particulate limit established in 326 IAC 6.5.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6.5.1-1 (Particulate Matter Limitations Except Lake County)

This stationary source is located in Marion County. This source is not specifically listed in 326 IAC 6.5-6 and the unlimited potential to emit is less than one hundred (100) tons of particulate matter per year. Therefore, 326 IAC 6.5-1-2 applies to this source.

<b>State Rule Applicability – Individual Facilities</b>
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Spray Paint Booths

- (a) 326 IAC 6.5 (PM Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-2(h), each of the seven (7) spray paint booths (PB#1 through PB#7) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with the manufacturer's specifications. This is a new requirement that was superseded by 326 IAC 6.5-6 because it was not specifically listed.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The unlimited VOC potential emissions from each paint booth is greater than twenty-five (25) tons per year when coating plastic parts. However, the source shall limit the VOC potential emissions from each paint booth to less than twenty-five (25) tons per year. Therefore, the proposed renewal is not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, each paint booth shall be limited as follows:

- (1) When coating plastic parts in PB#1, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) When coating plastic parts in PB#2, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (3) When coating plastic parts in PB#3, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (4) When coating plastic parts in PB#4, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (5) When coating plastic parts in PB#5, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (6) When coating plastic parts in PB#6, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (7) When coating plastic parts in PB#7, the Permittee shall limit the VOC input including VOC cleaners and solvents, to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

These are existing requirements and no change has been made in this renewal.

Compliance with these limits shall limit the potential to emit VOC from each paint booth to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

- (c) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)  
Pursuant to 326 IAC 8-2-1(a)(3), when coating miscellaneous metal parts and products the requirements of 326 IAC 8-2-9 are applicable to the seven paint booths (PB#1, PB#2, PB#3, PB#4, PB#5, PB#6 and PB#7) since they were constructed after July 1, 1990 and have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to 326 IAC 8-2-9, when coating miscellaneous metal parts and products in PB#1, PB#2, PB#3, PB#4, PB#5, PB#6 and PB#7, the Permittee shall comply with the following:

- (1) 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:
- (A) 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:
    - (i) lacks color or opacity; and
    - (ii) is transparent and uses the undercoat as a reflectant base or undertone color.
  - (B) 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).
  - (C) 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:
    - (i) temperatures consistently above ninety-five (95) degrees Celsius;
      - (a) detergents;
      - (b) abrasive or scouring agents;
      - (c) solvents;
      - (d) corrosive atmospheres;
      - (e) outdoor weather at all times; or
      - (f) similar environmental conditions.
  - (D) 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.

Based on the MSDS submitted by the source and calculations made, the spray booths can comply with this requirement.

- (2) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
- (A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (B) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (D) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (E) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- (d) 326 IAC 8-2-11 (Fabric and Vinyl Coating)  
This source is not subject to the requirements of 326 IAC 8-2-11 (Fabric and Vinyl Coating) since no vinyl materials are coated at this facility.

#### Powder Coating Booth

- (a) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-2(a), PM emissions from the powder coating booth shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)) and the cartridge filters must operate properly to ensure compliance. This is a new requirement since the source was not specifically listed in 326 IAC 6.5-1-2(a).

#### Five Stage Washer

- (a) There are no 326 IAC 8 Rules that are applicable to the Five-Stage Washer, identified as FSW#1, because the washer does not use any materials that contain VOC.

#### Natural Gas Combustion

- (b) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
The natural gas combustion units are subject to a particulate matter limitation specified in 326 IAC 6.5 that is as stringent as or more stringent than the particulate limitation established in 326 IAC 6-2. Therefore, the requirements of 326 IAC 6-2 do not apply to the natural gas combustion units.
- (c) 326 IAC 6.5-1-2 (Particulate Matter Limitations except Lake County)  
Pursuant to 326 IAC 6.5-1-2(a), the natural gas combustion units are each subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).
- (d) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from each natural gas-fired combustion unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.

- (e) There are no 326 IAC 8 Rules that are applicable to the natural gas combustion units.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Paint Booth - Dry Filters	Integrity and particulate loading inspections	Daily	NA	Response Steps
	Overspray observations	Weekly	Presence of overspray	
	Stack inspections	Monthly	Noticeable change or presence of overspray on rooftop or on ground nearby	

These monitoring conditions are necessary because the dry filters for the paint booths must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Matter Limitations except Lake County).

- (b) There are no testing requirements applicable to this proposed renewal. The source will demonstrate compliance with the VOC and HAP limits by keeping records of their total coating material and solvent usage and VOC and HAP contents of each coating material and solvent.

**Recommendation**

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

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 September 10, 2015

**Conclusion**

The operation of this Coating operations shall be subject to the conditions of the attached FESOP Renewal Renewal No. 097-36256-00674.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Nicholas Eilerman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Calculations  
SUMMARY

Company Name: Commercial Finishing Corporation  
 Source Address: 7199 English Avenue, Indianapolis, Indiana 46219  
 Permit Number: 097-36256-00674  
 Reviewer: Nicholas Eilerman

Uncontrolled Potential Emissions (tons/yr)										
Emission Unit	PM	PM 10	PM 2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Surface Coating (PB#1 through PB#7)	133.21	133.21	133.21	0.0	0.0	228.36	0.0	36.39	17.33	Toluene and Xylene
Powder Coating (PC#1)	11.04	11.04	11.04	0.0	0.0	0.0	0.0	0.0	0.0	
Natural Gas Combustion Units	0.17	0.67	0.67	0.05	8.78	0.48	7.38	0.17	0.16	Hexane
Five-stage Washer	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>144.41</b>	<b>144.91</b>	<b>144.91</b>	<b>0.05</b>	<b>8.78</b>	<b>228.84</b>	<b>7.38</b>	<b>36.56</b>	<b>17.33</b>	Toluene and Xylene

Limited/Controlled Potential to Emit after Modification (tons/yr)										
Emission Unit	PM	PM 10	PM 2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Surface Coating (PB#1 through PB#7)	6.66	6.66	6.66	0.0	0.0	80.0	0.0	24.00	9.0	Toluene and Xylene
Powder Coating (PC#1)	1.10	1.10	1.10	0.0	0.0	0.0	0.0	0.0	0.0	
Natural Gas Combustion Units	0.17	0.67	0.67	0.05	8.78	0.48	7.38	0.17	0.16	Hexane
Five-stage Washer	-	-	-	-	-	-	-	-	-	-
<b>TOTAL</b>	<b>7.93</b>	<b>8.43</b>	<b>8.43</b>	<b>0.05</b>	<b>8.78</b>	<b>80.48</b>	<b>7.38</b>	<b>24.17</b>	<b>9.0</b>	Toluene and Xylene

Total emissions based on rated capacity at 8,760 hours/year, after control.

**Appendix A: Emissions Calculations**  
**Surface Coating Operation - Paint Booths #1 through #7**

Company Name: Commercial Finishing Corporation  
 Source Address: 7199 English Avenue, Indianapolis, Indiana 46219  
 Permit Number: 097-36256-00674  
 Reviewer: Nicholas Eilerman

Potential VOC Emissions *						
Material	Potential throughput (sf/yr)	Potential Coating application (sf/gal)	Potential coating use (gal/yr)	Worst Case VOC Content (lb/gal coating)	Potential VOC (lbs/hr)	Potential VOC (ton/yr)
F63B70 (20%)	46,373,688	350	132496	3.45	52.14	228.36

\*The metal is sent through a washer before being sent to the spray booths. The washer is the bottleneck for the source.  
 The potential throughput for the paint booths is based upon the washer bottleneck throughput.  
 The addition of more paint booths does not affect the potential throughput or the potential emissions, because of this bottleneck.

**Methodology**

Potential throughput (sf/yr) is based on a maximum processing speed of 44.115 sf/min.  
 Potential coating application (sf/gal) based on empiracle data  
 Potential coating use (gal/yr) = potential throughput (sf/yr) x potential coating application (sf/gal)  
 VOC per gallon of coating based on worst case (see below)  
 Potential VOC pounds per hour = Potential coating use (gal. per yr) x VOC per gal. / 8760 (hrs/year)

Paint and solvent used as surface coating			
	Density (lb/gal)	Weight % Organics	VOC Content (lb/gal coating)
F63B70 (20%) *	11.49	30.00%	3.45
F63B70 mix	12.33	21.80%	2.69
F63B70	13.08	20.70%	2.71
V66V44	9.32	27.50%	2.56
R7K95 (solvent)	7.26	100.00%	7.26

\* F63B70 (20%) is a mixture of F63B70 (paint) and R7K95 (solvent), which represents the coating with the highest % organics (worst case).

**Potential Particulate Emissions**

Potential coating use (gal/hr)	Coating Density (lbs/gal)	1- weight % volatiles	1- transfer efficiency	1-dry filter efficiency	Hrs/yr	lbs/ton	PM/PM10/PM2.5 Before Control (tons/yr)	PM/PM10/PM2.5 After Control (tons/yr)
15.13	11.49	0.7	0.25	0.05	8760	2000	133.21	6.66

**Methodology**

Potential coating use (gal/hr) = potential coating use (gal/yr) / 8760 (hrs/year)  
 PM/PM10/PM2.5 Before Control (tons/yr) = (gal/hr) \* (lbs/gal) \* 1- weight% volatiles \* 1-transfer efficiency \* 8760 (hrs/yr) / 2000 (lb/ton)  
 PM/PM10/PM2.5 After Control (tons/yr) = (gal/hr) \* (lbs/gal) \* 1- weight% volatiles \* 1-transfer efficiency \* 1-dry filter efficiency \* 8760 (hrs/yr) / 2000 (lb/ton)  
 Transfer efficiency was estimated to be 75% per "Air Pollution Engineering Manual", Table 8, P. 325, second edition (2000)  
 Dry filter efficiency estimated to be 95%.

**Potential Hazardous Air Pollutant (HAP) Emissions**

	Coating Density (lb/gal)	Potential coating use (gal/yr)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Potential Xylene Emissions (tons/yr)	Potential Toluene Emissions (tons/yr)	Potential Ethylbenzene Emissions (tons/yr)
F63B70 (20%)	11.49	132,496	1.00%	1.00%	0.20%	7.61	7.61	1.52
F63B70 mix	12.33	132,496	1.00%	1.00%	0.20%	8.17	8.17	1.63
F63B70	13.08	132,496	2.00%	2.00%	0.20%	17.33	17.33	1.73

**Worst Case Potential Single HAP Emissions**      17.33      17.33      1.73

**Worst Case Potential Total HAP Emissions (tons/yr)**      **36.39**

**Methodology**

HAP Emissions (tons/yr) = Coating Density (lb/gal) x Potential coating use (gal/yr) x Weight % HAP / 2000 (lb)  
 Note: In the potential emission calculations, 100% evaporation of VOC and HAP is assumed.

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

**Company Name:** Commercial Finishing Corporation  
**Source Address:** 7199 English Avenue, Indianapolis, Indiana 46219  
**Permit Number:** 097-36256-00674  
**Reviewer:** Nicholas Eilerman

Maximum amount of powder used per hour (lbs)	Transfer Efficiency *	Uncontrolled PM/PM10/PM2.5 Emissions (lbs/hr)	Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)	Control Efficiency	Controlled PM/PM10/PM2.5 Emissions (lbs/hr)	Controlled PM/PM10/PM2.5 Emissions (tons/yr)
50.4	95.00%	2.52	11.04	90.00%	0.25	1.10

**Methodology**

Uncontrolled PM/PM10/PM2.5 (lbs/hr) = lb coating/hr x (1- transfer efficiency)

Controlled PM/PM10/PM2.5 = uncontrolled (lbs/hr)\* (1-control efficiency)

Uncontrolled PM/PM10/PM2.5 emissions (tons/yr) = lb/hr coating \* 8760 (days/yr) \* 2000 (lbs/ton)

Controlled PM/PM10/PM2.5 (tons/yr) = controlled (lbs/hr)\* 8760 (hrs/year) \* 2000 (lbs/ton)

\* Transfer efficiency from Air Pollution Engineering Manual, 2nd edition, Table 10 P. 366.

For the purposes of this emissions calculation, the transfer efficiency of 98% is conservatively reduced to 95%.

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

**Company Name:** Commercial Finishing Corporation  
**Source Address:** 7199 English Avenue, Indianapolis, Indiana 46219  
**Permit Number:** 097-36256-00674  
**Reviewer:** Nicholas Eilerman

Emission unit	MMBtu/hr
MU#1	7.29
DO#1	1.20
CO#1	3.20
BO#1	0.40
Stage #1 heater	3.96
Stage #3 heater	3.00
BO#2	0.40
BO#3	1.00
<b>Total</b>	<b>20.45</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
20.45	1020	175.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.17	0.67	0.67	0.05	8.78	0.48	7.38

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

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.8E-04	1.1E-04	6.6E-03	1.6E-01	3.0E-04	<b>1.7E-01</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.4E-05	9.7E-05	1.2E-04	3.3E-05	1.8E-04	<b>4.8E-04</b>

<b>Total HAPs</b>	<b>1.7E-01</b>
<b>Worst HAP</b>	<b>1.6E-01</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

February 23, 2016

Mr. Timothy Hughes  
Commercial Finishing Corp  
7199 English Ave  
Indianapolis, IN 46219

Re: Public Notice  
Commercial Finishing Corp  
Permit Level: FESOP - Renewal  
Permit Number: 097 - 36256 - 00674

Dear Mr. Hughes:

Enclosed is a copy of your draft FESOP - Renewal, 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 Indianapolis Star in Indianapolis, IN publish the abbreviated version of the public notice no later than February 26, 2016. 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 Irvington Branch Library, 5625 E. Washington Street in Indianapolis IN. 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 Nicholas Eilerman, 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 4-5373 or dial (317) 234-5373.

Sincerely,

*Len Pogost*

Len Pogost  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



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Governor

**Carol S. Comer**  
Commissioner

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

February 23, 2016

Indianapolis Star  
Attn: Classifieds  
130 S. Meridian St.  
Indianapolis, Indiana 46225

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Commercial Finishing Corp, Marion 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 February 26, 2016.

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 Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

*Len Pogost*

Len Pogost  
Permit Branch  
Office of Air Quality

Permit Level: FESOP - Renewal  
Permit Number: 097 - 36256 - 00674

Enclosure  
PN Newspaper.dot 6/13/2013



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

February 23, 2016

To: Irvington Branch Library 5625 E. Washington Street Indianapolis IN

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: Commercial Finishing Corp**  
**Permit Number: 097 - 36256 - 00674**

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 2/17/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**February 23, 2016**  
**Commercial Finishing Corp**  
**097 - 36256 - 00674**

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](mailto: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 2/17/2016

# Mail Code 61-53

IDEM Staff	LPOGOST 2/23/2016 Commercial Finishing Corp 097 - 36256 - 00674 draft/)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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		Timothy Hughes Commercial Finishing Corp 7199 English Ave Indianapolis IN 46219 (Source CAATS)									
2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
3		Indianapolis City Council 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
4		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
5		Mr. Christopher Bishop ATC Associates 7988 Centerpoint Drive, Ste. 100 Indianapolis IN 46256 (Consultant)									
6		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)									
7		Irvington Branch Library 5625 E. Washington Street Indianapolis IN 46219 (Library)									
8		Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 (Affected Party)									
9		Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 (Affected Party)									
10											
11											
12											
13											
14											
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 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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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