Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the transition of a Federally Enforceable Operating Permit (FESOP) to a Minor Source Operating Permit (MSOP)

The Indiana Department of Environmental Management (IDEM) has received an application from Lyon, LLC, located at 1000 West Barker Avenue, Michigan City, Indiana, for a transition from a FESOP to an MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Lyon, LLC, to operate its existing source.

This draft MSOP 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:

Michigan City Public Library
100 East 4th Street
Michigan City, IN 46360

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

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 30th 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 M091-36298-00139 in all correspondence.

Comments should be sent to:

Roger Osburn
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-0242
Or dial directly: (317) 233-0242
Fax: (317) 232-6749 attn: Roger Osburn
E-mail: rosburn@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, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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

Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

DRAFT

Minor Source Operating Permit
OFFICE OF AIR QUALITY

Lyon, LLC
1000 West Barker Avenue
Michigan City, Indiana 46360

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M091-36298-00139	
Issued by: Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

TABLE OF CONTENTS

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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary steel locker manufacturing and coating operation.

Source Address:	1000 West Barker Avenue, Michigan City, Indiana 46360
General Source Phone Number:	219-872-7238
SIC Code:	2542
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

(a) One (1) powder coating line, located in the Environmental Room (a segregated, interior room), constructed in 2005, permitted in 2011, with a maximum powder usage of 120.0 lbs/hr. The one (1) powder coating line consists of:

(1) One (1) manual spray booth, identified as PC-1, used to apply small runs of special colored powder, constructed in 2005, permitted in 2011, using a Torit Downflo canister filter assembly, identified as PCF-1, as particulate control, and exhausting indoors.

The Torit Downflo canister filter assembly consists of two (2) vacuum systems, each routed to twelve (12) filter canisters. This assembly is located in the Environmental Room and returns filtered air back into the room.

(2) One (1) Nordson Excel 2000 spray booth, identified as PC-2, with three (3) inserts, primarily used to apply gray, putty, and blue colored powders, constructed in 2009, permitted in 2011, equipped with twelve (12) automated Versa spray guns, using Nordson PowerGrid cartridge filters as particulate control, and exhausting indoors. Inserts may be occasionally cleaned out for use with special colors to minimize waste.

The Environmental Room is not equipped with a stack and does not have the ability to exhaust outdoors at this time.

(b) Five (5) MIG welders, identified as MIG-1 through MIG-5, constructed in 1996, 2005, 1996, 2005, and 1996, respectively, each with a maximum rod consumption of 1.3 lbs/hr, and with MIG-1 through MIG-4 exhausting to stacks MIGX-1 through MIGX-4, respectively. Welder MIG-5 exhausts indoors.

(c) Three (3) TIG welders, identified as TIG-1 through TIG-3, all constructed in 1996, each

with a maximum rod consumption of 1.3 lbs/hr, and exhausting indoors.

(d) One (1) arc welder, identified as Arc-1, constructed in 1996, with a maximum rod consumption of 1.3 lbs/hr, and exhausting indoors.

(e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour (MMBtu/hr):

(1) Five (5) Thermo-Cycler comfort heaters, identified as TC-1 through TC-5, each with a maximum capacity of 0.58 MMBtu/hr, all constructed before 1996, and exhausting to stacks TCX-1 through TCX-5, respectively.

(2) One (1) hot water washer boiler, identified as WB-1, with a maximum capacity of 3.0 MMBtu/hr, constructed before 1996, and exhausting to stack WBX-1.

(3) One (1) dry off oven, identified as DOO-1, with a maximum capacity of 2.0 MMBtu/hr, constructed before 1996, and exhausting to stack DOOX-1.

(4) One (1) curing oven, identified as CO-1, with a maximum capacity of 3.5 MMBtu/hr, constructed before 1996, and exhausting to stack COX-1.

(5) One (1) burn off oven, identified as BO-1, with a maximum capacity of 0.78 MMBtu/hr, constructed before 1996, and exhausting to stack BOX-1.

(f) Manufacturing equipment that is pneumatically or electrically operated, including sixteen (16) brake presses, sixteen (16) punch presses, six (6) roller formers, two (2) sheer presses, and two (2) coil lines, and eight (8) spot welders all exhausting indoors.

(g) One (1) maintenance shop, exhausting indoors.

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M091-36298-00139, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

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

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

B.7 Duty to Provide Information

(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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

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

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M091-36298-00139 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 permitted 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

(b) 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.18 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

(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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

(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 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, 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 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

(a) Reports required by conditions in Section D of 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

(b) 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.

(c) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) powder coating line, located in the Environmental Room (a segregated, interior room), installed in 2005, approved for construction in 2011, with a maximum powder usage of 120.0 lbs/hr. The one (1) powder coating line consists of:

(1) One (1) manual spray booth, identified as PC-1, used to apply small runs of special colored powder, constructed in 2005, permitted in 2011, using a Torit Downflo canister filter assembly, identified as PCF-1, as particulate control, and exhausting indoors.

The Torit Downflo canister filter assembly consists of two (2) vacuum systems, each routed to twelve (12) filter canisters. This assembly is located in the Environmental Room and returns filtered air back into the room.

(2) One (1) Nordson Excel 2000 spray booth, identified as PC-2, with three (3) inserts, primarily used to apply gray, putty, and blue colored powders, constructed in 2009, permitted in 2011, equipped with twelve (12) automated Versa spray guns, using Nordson PowerGrid integral cartridge filters as particulate control, and exhausting indoors. Inserts may be occasionally cleaned out for use with special colors to minimize waste.

The Environmental Room is not equipped with a stack and does not have the ability to exhaust outdoors at this time.

(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 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) powder coating line shall not exceed 10.85 pounds per hour when operating at a process weight rate of 4.275 tons per hour.

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

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

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

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Particulate Control

To assure compliance with Condition D.1.1, the Torit Downflo canister filter assembly, identified as PCF-1, for particulate control shall be in operation and control emissions from the one (1) manual spray booth, identified as PC-1, at all times that PC-1 is in operation and the Nordson

PowerGrid cartridge filters shall be in operation and control emissions from the one (1) Nordson Excel 2000 spray booth, identified as PC-2, at all times that PC-2 is in operation.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Filter Assembly Inspections

The Permittee shall perform semi-annual inspections of the Torit Downflo canister filter assembly, identified as PCF-1, controlling particulate from PC-1, and the Nordson PowerGrid cartridge filters, controlling particulate for PC-2, to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the dates and results of the inspections.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour (MMBtu/hr):

(2) One (1) hot water washer boiler, identified as WB-1, with a maximum capacity of 3.0 MMBtu/hr, constructed before 1996, and exhausting to stack WBX-1.

(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 2-6.1-5(a)(1)]

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating), the particulate emissions from the one (1) hot water washer boiler, identified as WB-1, shall be limited by the following equation:

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

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

The particulate emissions from the one (1) hot water washer boiler, identified as WB-1, shall not exceed 0.57 pounds of particulate per MMBtu.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Lyon, LLC
Address:	1000 West Barker Avenue
City:	Michigan City, Indiana 46360
Phone #:	219-872-7238
MSOP #:	M091-36298-00139

I hereby certify that Lyon, LLC is :

□ still in operation.
□ no longer in operation.

I hereby certify that Lyon, LLC is :

□ in compliance with the requirements of MSOP M091-36298-00139.
□ not in compliance with the requirements of MSOP M091-36298-00139.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a FESOP Transitioning to a Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	**Lyon, LLC**
Source Location:	**1000 West Barker Avenue, Michigan City, Indiana 46360**
County:	**LaPorte**
SIC Code:	**2542**
Operation Permit No.:	**M091-36298-00139**
Permit Reviewer:	**Roger Osburn**

On September 22, 2015, the Office of Air Quality (OAQ) received an application from Lyon, LLC related to the transition of a Federally Enforceable State Operating Permit to a Minor Source Operating Permit.

Existing Approvals

Since the issuance of the FESOP No. 091-28235-00139 on June 6, 2011, the source has constructed or has been operating under the following additional approvals:

(a) Administrative Amendment No. 091-33272-00139 issued on June 7, 2013.

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

County Attainment Status

The source is located in LaPorte County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM^{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Unclassifiable or attainment effective November 15, 1990, for the 1-hour standard which was revoked effective June 15, 2005.

(a) Ozone Standards

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

(b) $PM_{2.5}$
LaPorte County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Lyon, LLC on September 22, 2015, relating to the operation of a stationary steel locker manufacturing and coating operation. On March 16, 2016, Lyon, LLC submitted additional information that is relevant to the permit level. Therefore, the source is transitioning to an MSOP.

The source consists of the following permitted emission units:

(a) One (1) powder coating line, located in the Environmental Room (a segregated, interior room), constructed in 2005, permitted in 2011, with a maximum powder usage of 120.0 lbs/hr. The one (1) powder coating line consists of:

(1) One (1) manual spray booth, identified as PC-1, used to apply small runs of special colored powder, constructed in 2005, permitted in 2011, using a Torit Downflo canister filter assembly, identified as PCF-1, as particulate control, and exhausting indoors.

The Torit Downflo canister filter assembly consists of two (2) vacuum systems, each routed to twelve (12) filter canisters. This assembly is located in the Environmental Room and returns filtered air back into the room.

(2) One (1) Nordson Excel 2000 spray booth, identified as PC-2, with three (3) inserts, primarily used to apply gray, putty, and blue colored powders, constructed in 2009, permitted in 2011, equipped with twelve (12) automated Versa spray guns, using Nordson PowerGrid cartridge filters as particulate control, and exhausting indoors. Inserts may be occasionally cleaned out for use with special colors to minimize waste.

The Environmental Room is not equipped with a stack and does not have the ability to exhaust outdoors at this time.

(b) Five (5) MIG welders, identified as MIG-1 through MIG-5, constructed in 1996, 2005, 1996, 2005, and 1996, respectively, each with a maximum rod consumption of 1.3 lbs/hr, and with MIG-1 through MIG-4 exhausting to stacks MIGX-1 through MIGX-4, respectively. Welder MIG-5 exhausts indoors.

(c) Three (3) TIG welders, identified as TIG-1 through TIG-3, all constructed in 1996, each with a maximum rod consumption of 1.3 lbs/hr, and exhausting indoors.

(d) One (1) arc welder, identified as Arc-1, constructed in 1996, with a maximum rod consumption of 1.3 lbs/hr, and exhausting indoors.

(e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour (MMBtu/hr):

(1) Five (5) Thermo-Cycler comfort heaters, identified as TC-1 through TC-5, each with a maximum capacity of 0.58 MMBtu/hr, all constructed before 1996, and exhausting to stacks TCX-1 through TCX-5, respectively.

(2) One (1) hot water washer boiler, identified as WB-1, with a maximum capacity of 3.0 MMBtu/hr, constructed before 1996, and exhausting to stack WBX-1.

(3) One (1) dry off oven, identified as DOO-1, with a maximum capacity of 2.0 MMBtu/hr, constructed before 1996, and exhausting to stack DOOX-1.

(4) One (1) curing oven, identified as CO-1, with a maximum capacity of 3.5 MMBtu/hr, constructed before 1996, and exhausting to stack COX-1.

(5) One (1) burn off oven, identified as BO-1, with a maximum capacity of 0.78 MMBtu/hr, constructed before 1996, and exhausting to stack BOX-1.

(f) Manufacturing equipment that is pneumatically or electrically operated, including sixteen (16) brake presses, sixteen (16) punch presses, six (6) roller formers, two (2) sheer presses, and two (2) coil lines, and eight (8) spot welders all exhausting indoors.

(g) One (1) maintenance shop, exhausting indoors.

Air Pollution Control Justification as an Integral Part of the Process

On July 20, 2009, the Permittee submitted information requesting that the Nordson PowerGrid cartridge filters controlling particulates on the one (1) Nordson Excel 2000 spray booth, identified as PC-2, be considered integral to the process for the powder coating operation. IDEM, OAQ evaluated the justifications and agreed that the Nordson PowerGrid cartridge filters will be considered integral to the process. This evaluation and approval was discussed in initial FESOP, No. 091-28235-00132, issued on June 6, 2011.

Enforcement Issues

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	212.79
PM_{10} (1)	18.79
$PM_{2.5}$	18.79
SO_2	0.03
NO_x	5.23
VOC	0.73
CO	4.39
Total HAPs	0.18

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

(a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM is greater than twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 (40 CFR 60, Subpart D) (326 IAC 12) are not included in the permit for the one (1) hot water washer boiler, identified as WB-1, since this emission unit does not have a heat input rate of more than 250 million British thermal units per hour (MMBtu/hr).

(b) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Db) (326 IAC 12) are not included in the permit for the one (1) hot water washer boiler, identified as WB-1, since this emission unit does not have a heat input capacity of greater than 100 million British thermal units per hour (MMBtu/hr).

(c) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) (326 IAC 12) are not included in the permit for the one (1) hot water washer boiler, identified as WB-1, since this emission unit has a maximum design heat input capacity of less than 10 MMBtu/hr.

(d) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture (40 CFR 60, Subpart EE) (326 IAC 12) are not included in the permit for the one (1) powder coating line since this is not a metal furniture surface coating operation in which organic coatings are applied. Pursuant to 40 CFR 60.331, powder coatings are not included in the definition of organic coatings.

(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 in the permit for the one (1) powder coating

line since this is not an affected facility in a metal coil surface coating operation.

(f) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM) (326 IAC 20-80) are not included in the permit for the one (1) powder coating line since this source is not a major source of HAPs.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture (40 CFR Part 63, Subpart RRRR) (326 IAC 20-78) are not included in the permit for the one (1) powder coating line since this source is not a major source of HAPs.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil (40 CFR Part 63, Subpart SSSS) (326 IAC 20-64) are not included in the permit for the one (1) powder coating line since this facility does not perform metal coil surface coating operations and the source is not a major source of HAPs.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart HHHHHH) are not included in the permit for the one (1) powder coating line since this facility is not involved in any of the following activities:

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

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

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

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR Part 63, Subpart XXXXXX) are not included in the permit for the metal fabricating operations since the source is not primarily engaged in any of the operations in the nine source categories listed in 40 CFR 63.11514 (a)(1) through (9) (i.e., it does not operate under any of the NAICS codes listed in 73 FR 43000, July 23, 2008).

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

(a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
The uncontrolled potential to emit of all regulated criteria pollutants are less than 250 tons per year, and it is not one of the twenty-eight (28) listed source categories. Therefore, the source is not subject to 326 IAC 2-2 (PSD).

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

(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), although it is located in LaPorte County, it has actual emissions of NOx and VOC of less than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

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

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

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

(g) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(h) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

<u>Powder Coating Operation</u>

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) powder coating line shall not exceed 10.85 pounds per hour when operating at a process weight rate of 4.275 tons per hour.

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

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

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

Note: Pursuant to 326 IAC 1-2-59, the process weight rate as defined includes the weight of the lockers/shelving coated and the weight of the powder coating.

The Torit Downflo canister filter assembly and/or the Nordson PowerGrid cartridge filters shall be in operation at all times the powder coating line is in operation, in order to comply with this limit.

Compliance Determination, Monitoring, and Testing Requirements

The compliance determination requirements applicable to this source are as follows:

(a) The Torit Downflo canister filter assembly, shall be in operation and control emissions from the one (1) manual spray booth, identified as PC-1, at all times that PC-1 is in operation and the Nordson PowerGrid cartridge filters shall be in operation and control emissions from the one (1) Nordson Excel 2000 spray booth, identified as PC-2, at all times that PC-2 is in operation.

The compliance monitoring requirements applicable to this source are as follows:

(b) The one (1) powder coating line which consists of one (1) manual spray booth, identified as PC-1, and one (1) Nordson Excel 2000 spray booth, identified as PC-2, has applicable compliance monitoring conditions as specified below:

(1) The Permittee shall perform semi-annual inspections of the Torit Downflo canister filter assembly, identified as PCF-1, controlling particulate from PC-1, and the Nordson PowerGrid cartridge filters, controlling particulate for PC-2, to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective filters shall be replaced.

These monitoring conditions are necessary because the emission controls must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(c) No testing of the Powder Coating Operations (PC-1 and PC-2) is required because the PTE is calculated using a conservative transfer efficiency of sixty (60) percent.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 22, 2015.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. M091-36298-00139. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Roger Osburn at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0242 or toll free at 1-800-451-6027 extension 3-0242.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emission Calculations
PTE Summary

Company Name: Lyon, LLC
Address: 1000 West Barker Ave, Michigan City, IN 46360
MSOP No.: M091-36298-00139
Reviewer: Roger Osburn
Date: March 22, 2016

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	**PM**	**PM10**	**PM2.5 ***	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAPs**
Natural Gas Combustion (TC-1 through TC-5, WB-1, DOO-1, CO-1, BO-1)	0.10	0.40	0.40	0.03	5.23	0.29	4.39	0.10
Welding (MIG-1 through MIG-5, TIG-1 through TIG-3, Arc-1)	0.46	0.46	0.46	0.0	0.0	0.0	0.0	0.09
Powder Coating Line								
Manual Spray Booth (PC-1)	210.24	15.94	15.94	0.0	0.0	0.0	0.0	0.0
Nordson Excel 2000 Spray Booth (PC-2)[1]	10.51	0.80	0.80	0.0	0.0	0.0	0.0	0.0
Powder Coating Line - Worst Case PTE**	**210.24**	**15.94**	**15.94**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**
Manufacturing Equipment[2]	<1	<1	<1	0.0	0.0	0.44	0.0	0.0
Maintenance Shop[2]	<1	<1	<1	-	-	negl.	-	-
Total	**212.79**	**18.79**	**18.79**	**0.03**	**5.23**	**0.73**	**4.39**	**0.18**
Fugitive Emissions: Paved Roads	0.04	0.01	0.00	0	0	0	0	0

** PM2.5 listed is direct PM2.5*

Potential to Emit after Control (tons/yr)								
Emission Unit	**PM**	**PM10**	**PM2.5 ***	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAPs**
Natural Gas Combustion (TC-1 through TC-5, WB-1, DOO-1, CO-1, BO-1)	0.10	0.40	0.40	0.03	5.23	0.29	4.39	0.10
Welding (MIG-1 through MIG-5, TIG-1 through TIG-3, Arc-1)	0.46	0.46	0.46	0.0	0.0	0.0	0.0	0.09
Powder Coating Line								
Manual Spray Booth (PC-1)	31.54	2.39	2.39	0.0	0.0	0.0	0.0	0.0
Nordson Excel 2000 Spray Booth (PC-2)[1]	10.51	0.80	0.80	0.0	0.0	0.0	0.0	0.0
Powder Coating Line - Worst Case PTE**	**31.54**	**2.39**	**2.39**	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**
Manufacturing Equipment[2]	<1	<1	<1	0.0	0.0	0.44	0.0	0.0
Maintenance Shop[2]	<1	<1	<1	-	-	negl.	-	-
Total	**34.09**	**5.24**	**5.24**	**0.03**	**5.23**	**0.73**	**4.39**	**0.18**
Fugitive Emissions: Paved Roads	0.04	0.01	0.00	0	0	0	0	0

** PM2.5 listed is direct PM2.5*

[1]After controls because controls have been determined by IDEM to be integral.

[2]IDEM approved estimated PTE based on worst case scenarios of processes

**Worst-case potential to emit between the two spray booths; calculations were done so that the PTE of the two booths is mutually exclusive; meaning the lockers or shelving goes to either PC-1 or PC-2.

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

Company Name: **Lyon, LLC**
Source Address: **1000 West Barker Ave, Michigan City, IN 46360**
MSOP No.: **M091-36298-00139**
Reviewer: **Roger Osburn**
Date: **March 22, 2016**

This source contains:

) Thermo-Cycler comfort heaters (TC-1 through TC-5), each with a heat input capacity of	0.58	MMBtu/hr.
One (1) hot water washer boiler (WB-1), with a heat input capacity of	3.00	MMBtu/hr.
One (1) dry off oven (DOO-1), with a heat input capacity of	2.00	MMBtu/hr.
One (1) curing oven (CO-1), with a heat input capacity of	3.50	MMBtu/hr.
One (1) burn off oven (BO-1), with a heat input capacity of	0.78	MMBtu/hr.

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
12.2	1020	104.6

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.10	0.40	0.40	0.03	5.23	0.29	4.39

*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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.1E-04	6.3E-05	3.9E-03	0.09	1.8E-04	**0.10**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.6E-05	5.8E-05	7.3E-05	2.0E-05	1.1E-04	**2.9E-04**

Methodology is the same as above.	**Total HAPs**	**0.10**
The five highest organic and metal HAPs emission factors are provided above.	**Worst HAP**	**0.09**
Additional HAPs emission factors are available in AP-42, Chapter 1.4.		

Company Name: **Lyon, LLC**
Address: **1000 West Barker Ave, Michigan City, IN 46360**
MSOP No.: **M091-36298-00139**
Reviewer: **Roger Osburn**
Date: **March 22, 2016**

Activity (Emission Unit)	Number of Stations	Maximum Electrode Consumption per Station (lb/hr)	$PM/PM_{10}/PM_{2.5}$ Emission Factor (lb/lb electrode)	Manganese Emission Factor (lb/lb electrode)	$PM/PM_{10}/PM_{2.5}$ Emissions (tons/yr)	Manganese Emissions (tons/yr)
MIG Welding (MIG-1 through MIG-5)	5.0	1.3	0.0055	0.0005	0.157	0.014
TIG Welding (TIG-1 through TIG-3)	3.0	1.3	0.0055	0.0005	0.094	0.009
Arc Welding (Arc-1)	1.0	1.3	0.036	0.011	0.205	0.063
Total					**0.46**	**0.09**

Methodology

Emissions (tons/yr) = Number of Stations * Maximum Electrode Consumption per Station (lb/hr) * Emission Factor (lb/lb electrode) * (8760 hrs/yr) * (1 ton/2000 lbs)

Emission factors are from an internal IDEM document, "Welding and Flame Cutting". Refer to US EPA's AP 42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emissions Calculations
Powder Coating Lines (PC-1 and PC-2)

Company Name: **Lyon, LLC**
Address: **1000 West Barker Ave, Michigan City, IN 46360**
MSOP No.: **M091-36298-00139**
Reviewer: **Roger Osburn**
Date: **March 22, 2016**

Activity (Emission Unit)	Powder Color	Maximum Powder Usage (lbs/hr)	Transfer Efficiency	Control Efficiency	Uncontrolled PM Emissions (lb/hr)	Uncontrolled PM10/PM2.5 (lb/hr) **	Uncontrolled PM Emissions (tons/yr)	Uncontrolled PM10/PM2.5 (tons/yr) **	Controlled PM Emissions (lb/hr)	Controlled PM10/PM2.5 Emissions (lb/hr) **	Controlled PM Emissions (tons/yr)	Controlled PM10/PM2.5 (tons/yr) **	Compliance with 326 IAC 6-3-2
Manual Spray Booth (PC-1)*	special	120.0	60.0%	85.0%	**48.00**	**3.64**	**210.24**	**15.94**	**7.20**	**0.55**	**31.54**	**2.39**	**Yes**
Nordson Excel 2000 Spray Booth (PC-2)	gray, putty, and blue	120.0	60.0%	95.0%	**48.00**	**3.64**	**210.24**	**15.94**	**2.40**	**0.18**	**10.51**	**0.80**	

Notes:

*The manual spray booth is used only for small runs of special orders.

** Using highest Powder Coating PM10 content (7.58%) from Manufacturer's size distribution.

Methodology

The control device on the Nordson Excel Spray Booth has been determined by IDEM to be integral to the process.

Uncontrolled $PM/PM_{10}/PM_{2.5}$ Emissions (tons/yr) = Maximum Powder Usage (lb/hr) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Controlled $PM/PM_{10}/PM_{2.5}$ Emissions (tons/yr) = Maximum Powder Usage (lb/hr) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs) * (1 - Control Efficiency)

Limited $PM/PM_{10}/PM_{2.5}$ Emissions (tons/yr) = Limited Powder Usage (lb/hr) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Lyon, LLC
Source Address: 1000 West Barker Avenue, Michigan City, IN 46360
MSOP No.: M091-36298-00139
Reviewer: Roger Osburn
Date: March 22, 2016

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

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Car (entering plant) (one-way trip)	53.0	1.3	68.9	1.5	103.4	25	0.005	0.3	119.1
Car (leaving plant) (one-way trip)	53.0	1.3	68.9	1.5	103.4	25	0.005	0.3	119.1
Shipping Truck (entering plant) (one-way trip)	2.0	1.0	2.0	10.0	20.0	75	0.014	0.0	10.4
Shipping Truck (leaving plant) (one-way trip)	2.0	1.0	2.0	20.0	40.0	75	0.014	0.0	10.4
Delivery Truck (entering plant) (one-way trip)	5.0	1.0	5.0	30.0	150.0	75	0.014	0.1	25.9
Delivery Truck (leaving plant) (one-way trip)	5.0	1.0	5.0	10.0	50.0	75	0.014	0.1	25.9
		Totals	**151.8**		**466.7**			**0.9**	**310.7**

Average Vehicle Weight Per Trip = 3.1 tons/trip
Average Miles Per Trip = 0.01 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	3.1	3.1	3.1	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.273	0.055	0.0134	lb/mile
Mitigated Emission Factor, Eext =	0.250	0.050	0.0123	lb/mile
Dust Control Efficiency =				(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.02	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.02	0.00	0.00	0.01	0.00	0.00	0.01	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals	**0.04**	**0.01**	**0.00**	**0.04**	**0.01**	**0.00**	**0.04**	**0.01**	**0.00**

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

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

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

April 13, 2016

Mr. Walter Wigley
Lyon, LLC
1000 West Barker Avenue
Michigan City, IN 46360

Re: Public Notice
Lyon, LLC
Permit Level: Minor Source Operating Permit (MSOP)
Permit Number: 091-36298-00139

Dear Mr. Wigley:

Enclosed is a copy of your draft Minor Source Operating Permit, 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 News Dispatch in Michigan City, Indiana publish the abbreviated version of the public notice no later than April 16, 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 Michigan City Public Library, 100 East 4th Street in Michigan City, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Roger Osburn, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0242 or dial (317) 233-0242.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 12, 2016

News Dispatch
422 Franklin Street, Suite B
Michigan City, IN 46360

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Lyon, LLC, LaPorte 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 April 16, 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 Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Minor Source Operating Permit (MSOP)
Permit Number: 091-36298-00139

Enclosure

PN Newspaper.dot 2/17/2016

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

April 13, 2016

To: Michigan City Public Library

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

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

Applicant Name: Lyon, LLC
Permit Number: 091-36298-00139

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
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

April 13, 2016
Lyon, LLC
091-36298-00139

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VHAUN 4/13/2016 Lyon, LLC 091-36298-00139 DRAFT		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	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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		Walter Wigley Lyon, LLC 1000 W Barker Ave Michigan City IN 46360 (Source CAATS)									
2		LaPorte City Council/ Mayors Ofc. 801 Michigan Avenue LaPorte IN 46350 *(Local Official)*									
3		Laporte County Public Library-Michigan City Branch 100 East 4th Street Michigan City IN 46360-3393 *(Library)*									
4		LaPorte County Commissioners 555 Michigan Avenue # 202 LaPorte IN 46350 *(Local Official)*									
5		Mr. Dennis Hahney Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 *(Affected Party)*									
6		Michigan City-City Council and Mayors Office 100 E. Michigan Blvd. Michigan City IN 46360 *(Local Official)*									
7		LaPorte County Health Department County Complex, 4th Floor, 809 State St. LaPorte IN 46350-3329 *(Health Department)*									
8		Pottawattamie Park Town Council 500 Marquette Trail Michigan City IN 46360 *(Local Official)*									
9		Mr. Dick Paulen Barnes & Thornburg 121 W Franklin Street Elkhart IN 46216 *(Affected Party)*									
10		Mr. Bruce Meerman Mostardi Platt Environmental 888 Industrial Drive Elmhurst IL 60126 *(Consultant)*									
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 ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
10			

FACSIMILIE OF PS Form 3877