



# 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 a New Souce Construction and  
Minor Source Operating Permit (MSOP)

for Colorimetric in St. Joseph County

MSOP No.: M 141-36790-00034

The Indiana Department of Environmental Management (IDEM) has received an application from Colorimetric, located at 1711 Clover Road, Mishawaka, IN 46545, for a Registration transitioning to a MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Colorimetric to operate stationary putty tape, sealants & finger putty manufacturing operation.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

IDEM is aware that the three (3) Putty Mixing Units (M-6 - M-8), three (3) Paint Mixing Units (M-9 - M-11) and four (4) Bag Houses (BH3 - BH6) has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft MSOP contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Mishawaka-Penn-Harris Public Library  
209 Lincoln Way East  
Mishawaka, IN 46544

and

IDEM Northern Regional Office  
300 N. Michigan Street, Suite 450  
South Bend, IN 46601-1295

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 M 141-36790-00034 in all correspondence.

**Comments should be sent to:**

Vasantha Palakurti  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-4907  
Or dial directly: (317) 234-4907  
Fax: (317) 232-6749 attn: Vasantha Palakurti  
E-mail: VPalakur@idem.IN.gov

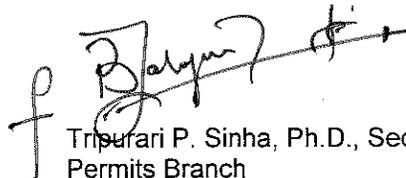
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have 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 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 Vasantha Palakurti of my staff at the above address.



Triparani P. Sinha, Ph.D., Section Chief  
Permits Branch  
Office of Air Quality



# Indiana Department of Environmental Management

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**Michael R. Pence**  
*Governor*

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*Commissioner*

## DRAFT

# Minor Source Operating Permit OFFICE OF AIR QUALITY

**Colorimetric  
1711 Clover Road  
Mishawaka, Indiana 46545**

(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.: 141 36790 00034	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

## TABLE OF CONTENTS

TABLE OF CONTENTS .....	2
<b>SECTION A SOURCE SUMMARY .....</b>	<b>4</b>
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)].....	4
A.2 Emission Units and Pollution Control Equipment Summary.....	4
<b>SECTION B GENERAL CONDITIONS.....</b>	<b>5</b>
B.1 Definitions [326 IAC 2-1.1-1].....	5
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)].....	5
B.3 Term of Conditions [326 IAC 2-1.1-9.5] .....	5
B.4 Enforceability.....	5
B.5 Severability.....	5
B.6 Property Rights or Exclusive Privilege .....	5
B.7 Duty to Provide Information .....	5
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)].....	6
B.9 Preventive Maintenance Plan [326 IAC 1-6-3].....	6
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5] .....	7
B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)].....	7
B.12 Permit Renewal [326 IAC 2-6.1-7] .....	7
B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6] .....	7
B.14 Source Modification Requirement.....	8
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 13-3 0-3-1].....	8
B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6] .....	8
B.17 Annual Fee Payment [326 IAC 2-1.1-7] .....	9
B.18 Credible Evidence [326 IAC 1-1-6] .....	9
<b>SECTION C SOURCE OPERATION CONDITIONS.....</b>	<b>10</b>
<b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].....</b>	<b>10</b>
C.1 Permit Revocation [326 IAC 2-1.1-9] .....	10
C.2 Opacity [326 IAC 5-1].....	10
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9] .....	10
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2].....	10
C.5 Fugitive Dust Emissions [326 IAC 6-4] .....	10
C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M] ...	11
<b>Testing Requirements [326 IAC 2-6.1-5(a)(2)] .....</b>	<b>12</b>
C.7 Performance Testing [326 IAC 3-6] .....	12
<b>Compliance Requirements [326 IAC 2-1.1-11] .....</b>	<b>12</b>
C.8 Compliance Requirements [326 IAC 2-1.1-11] .....	12
<b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)].....</b>	<b>12</b>
C.9 Compliance Monitoring [326 IAC 2-1.1-11].....	12
C.10 Instrument Specifications [326 IAC 2-1.1-11] .....	12
<b>Corrective Actions and Response Steps.....</b>	<b>13</b>
C.11 Response to Excursions or Exceedances .....	13
C.12 Actions Related to Noncompliance Demonstrated by a Stack Test .....	13
<b>Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)].....</b>	<b>14</b>
C.13 Malfunctions Report [326 IAC 1-6-2].....	14
C.14 General Record Keeping Requirements [326 IAC 2-6.1-5] .....	14
C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13].....	14

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS ..... 16**

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]..... 16**

    D.1.1 Particulate Emissions Limitations [326 IAC 6.5] ..... 16

    D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]..... 16

**Compliance Determination Requirements [326 IAC 326 IAC 2 6.1 5] ..... 16**

    D.1.3 Particulate Control..... 16

    D.1.4 Broken or Failed Bag Detection - Baghouse/Filter ..... 17

**Compliance Monitoring Requirements [326 IAC 2 6.1 5(a)(2)] ..... 17**

    D.1.5 Baghouse Inspections..... 17

**Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]..... 17**

    D.1.6 Record Keeping Requirements ..... 17

**ANNUAL NOTIFICATION ..... 18**

**MALFUNCTION REPORT ..... 19**

## 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)]

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The Permittee owns and operates a stationary putty tape, sealants & finger putty manufacturing operation.

Source Address:	1711 Clover Road, Mishawaka, Indiana 46545
General Source Phone Number:	574-255-9619
SIC Code:	2891 (Adhesives and Sealants)
County Location:	St Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD 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

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

- (a) Seven (7) small natural gas fired space heaters, identified as (NG1), constructed in 2013, with a total heat input capacity of 1.4 MMBtu/hr .
- (b) Five (5) mixing units, identified as M-1 - M-5, constructed in 2013, with a total hourly powder handling rate of 3266 lbs/hr, using baghouses (BH1 and BH2) as control and exhausting indoors.
- (c) Two (2) paint adhesive mixers, identified as M-9, M-10, constructed in 2014, with a maximum capacity of 1500 gallons each, using baghouse (BH6) as control and exhausting indoors.
- (d) One (1) paint adhesive mixer, identified as M-11, constructed in 2014, with a maximum capacity of 3000 gallons, using baghouse (BH6) as control and exhausting indoors.
- (e) Two (2) putty adhesive mixers, identified as M-6, M-7, each constructed in 2014, with a maximum capacity of 400 gallons each, using baghouses (BH3, BH4 and BH5) as control and exhausting indoors.
- (f) One (1) putty adhesive mixer, identified as M-8, constructed in 2014, with a maximum capacity of 500 gallons, using baghouses (BH3, BH4 and BH5) as control and exhausting indoors.

## SECTION B GENERAL CONDITIONS

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

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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 2-1.1-1) 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)]

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- (a) This permit, 141 36790 00034, 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]

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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

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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

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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

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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

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

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- (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]**

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- (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]**

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- (a) All terms and conditions of permits established prior to 141 36790 00034 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)]**

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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 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]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. 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]**

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- (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**

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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]

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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]**

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- (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]**

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- (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]**

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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 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.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]

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]

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 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.7 Performance Testing [326 IAC 3-6]**

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- (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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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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.9 Compliance Monitoring [326 IAC 2-1.1-11]**

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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.10 Instrument Specifications [326 IAC 2-1.1-11]**

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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. 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.11 Response to Excursions or Exceedances

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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.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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- (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.13 Malfunctions Report [326 IAC 1-6-2]

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

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- (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.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (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) Seven (7) small natural gas fired space heaters, identified as (NG1), constructed in 2013, with a total heat input capacity of 1.4 MMBtu/hr .
- (b) Five (5) mixing units, identified as M-1 - M-5, constructed in 2013, with a total hourly powder handling rate of 3266 lbs/hr, using baghouses (BH1 and BH2) as control and exhausting indoors.
- (c) Two (2) paint adhesive mixers, identified as M-9, M-10, constructed in 2014, with a maximum capacity of 1500 gallons each, using baghouse (BH6) as control and exhausting indoors.
- (d) One (1) paint adhesive mixer, identified as M-11, constructed in 2014, with a maximum capacity of 3000 gallons, using baghouse (BH6) as control and exhausting indoors.
- (e) Two (2) putty adhesive mixers, identified as M-6, M-7, each constructed in 2014, with a maximum capacity of 400 gallons each, using baghouses (BH3, BH4 and BH5) as control and exhausting indoors.
- (f) One (1) putty adhesive mixer, identified as M-8, constructed in 2014, with a maximum capacity of 500 gallons, using baghouses (BH3, BH4 and BH5) as control and exhausting indoors.

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

#### D.1.1 Particulate Emissions Limitations [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(a), Particulate matter emissions from each of the emission units mentioned in Section D.1 of this permit shall not exceed 0.07 gram per dry standard cubic meter (g/dscm), (0.03) grain per dry standard cubic foot (dscf)).

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

A Preventive Maintenance Plan is required for these facilities and any 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 326 IAC 2- 6.1- 5]

#### D.1.3 Particulate Control

In order to ensure compliance with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from the mixing units (M-1 through M-5), the adhesive mixers (M-6 through M-11) operations at all times the mixing units (M-1 through M-5), the adhesive mixers (M-6 through M-11) operations is in operation.

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the

applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.1.4 Broken or Failed Bag Detection - Baghouse/Filter

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

#### D.1.5 Baghouse Inspections

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The Permittee shall perform semi-annual inspections of the baghouses controlling particulate from the mixing units (M-1 through M-5), the adhesive mixers (M-6 through M-11) operations to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

#### D.1.6 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.5 the Permittee shall maintain records of the results of the inspections required under Condition D.1.5.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

**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).

<b>Company Name:</b>	Colorimetric
<b>Address:</b>	1711 Clover Road
<b>City:</b>	Mishawaka, Indiana 46545
<b>Phone #:</b>	5742559619
<b>MSOP #:</b>	141 36790 00034

I hereby certify that Colorimetric is :

still in operation.

no longer in operation.

I hereby certify that Colorimetric is :

in compliance with the requirements of MSOP 141 36790 00034.

not in compliance with the requirements of MSOP 141 36790 00034.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**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 shut down during a control equipment shutdown.

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

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

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

**Source Description and Location**

<b>Source Name:</b>	<b>Colorimetric</b>
<b>Source Location:</b>	<b>1711 Clover Road, Mishawaka, Indiana 46545</b>
<b>County:</b>	<b>St. Joseph (Penn Township)</b>
<b>SIC Code:</b>	<b>2891 (Adhesives and Sealants)</b>
<b>Operation Permit No.:</b>	<b>141-36790-00034</b>
<b>Permit Reviewer:</b>	<b>Vasantha Palakurti</b>

On February 2, 2016, the Office of Air Quality (OAQ) received an application from Colorimetric related to the construction and operation of new emission units at an existing stationary putty tape, sealants & finger putty manufacturing operation and transition from a Registration to a MSOP.

**Existing Approvals**

The source has been operating under registration No. 141-13723-00034, issued on February 06, 2001. Due to this application, the source is transitioning from a registration to a MSOP.

**County Attainment Status**

The source is located in St. Joseph County.

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

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including St. Joseph 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 standard was revoked effective June 15, 2005

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  
- (b) **PM<sub>2.5</sub>**  
St. Joseph County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>,

SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants  
St. Joseph County has been classified as attainment or unclassifiable in Indiana CO, PM<sub>10</sub>, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

- (a) The fugitive emissions of regulated pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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 Colorimetric on February 2, 2016, relating to construction and operation of putty mixing tanks and putty mixing dust collectors and transitioning to a new MSOP.

The source consists of the following permitted emission units:

- (a) Seven (7) small natural gas fired space heaters, identified as (NG1), constructed in 2013, with a total heat input capacity of 1.4 MMBtu/hr.
- (b) Five (5) mixing units, identified as M-1 - M-5, constructed in 2013, with a total hourly powder handling rate of 3266 lbs/hr, using baghouses (BH1 and BH2) as control and exhausting inside..

#### **Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted emission units:

- (c) Two (2) paint adhesive mixers, identified as M-9, M-10, constructed in 2014, with a maximum capacity of 1500 gallons each, using baghouse (BH6) as control and exhausting indoors.
- ..
- (d) One (1) paint adhesive mixer, identified as M-11, constructed in 2014, with a maximum capacity of 3000 gallons, using baghouse (BH6) as control and exhausting indoors.
- (e) Two (2) putty adhesive mixers, identified as M-6, M-7, each constructed in 2014, with a maximum capacity of 400 gallons each, using baghouses (BH3, BH4 and BH5) as control and exhausting indoors.
- (f) One (1) putty adhesive mixer, identified as M-8, constructed in 2014, with a maximum capacity of 500 gallons, using baghouses (BH3, BH4 and BH5) as control and exhausting indoors.

#### **Enforcement Issues**

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

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – 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	53.38
PM10 <sup>(1)</sup>	53.42
PM2.5	53.42
SO <sub>2</sub>	0.00
NO <sub>x</sub>	0.60
VOC	5.18
CO	0.50

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

HAPs	Potential To Emit (tons/year)
Ethylene Glycol	0.10
<b>TOTAL HAPs</b>	<b>0.10</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM<sub>2.5</sub> and PM<sub>10</sub> are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated 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.

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

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this MSOP.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5*	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Paint Adhesive Mixing (M-9, M-10, M-11)	23.41	23.41	23.41	0.0	0.0	5.15	0.0	0.10	0.10 (Ethylene Glycol)
Putty Adhesive Mixing (M-1 - M-5)	14.98	14.98	14.98	0.0	0.0	0.00	0.0	0.0	0.0
Putty Adhesive Mixing (M-6 - M-8)	14.98	14.98	14.98	0.0	0.0	0.00	0.0	0.0	0.0
Space Heaters (NG1)	0.01	0.05	0.05	0.0	0.6	0.03	0.50	0.0	0.0
<b>Total PTE of Entire Source</b>	<b>53.38</b>	<b>53.42</b>	<b>53.42</b>	<b>0.00</b>	<b>0.60</b>	<b>5.18</b>	<b>0.50</b>	<b>0.11</b>	<b>0.10</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA

negl. = negligible  
\*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions From The Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes, 40 CFR 60, Subpart III (326 IAC 12), are not included in the permit, since this source does not manufacture any synthetic organic chemicals.
- (b) 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)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, 40 CFR 63.110, Subpart G, are not included in the permit, since this source is not part of or located at a major source of HAPs.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Paints And Allied Products Manufacturing, 40 CFR 63.11599, Subpart CCCCCC, are not included in the permit, since the source does not operate or own a facility that performs paints and allied products manufacturing
- (e) The requirements of the National Emission Standards for Hazardous Pollutants (NESHAPs): Miscellaneous Organic Chemical Manufacturing, 40 CFR 63.2430, Subpart FFFF, are not included in the permit, because the source is not located or part of a major source of HAPs as defined in section 63.2435(a).
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chemical Manufacturing Area Sources, 40 CFR 63.11494, Subpart VVVVVV (6V), are not included in this permit, because the source does not manufacture any of the HAPs listed in Table 1 of Subpart VVVVVV (6) as defined in section 63.11494(a)(2).
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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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))  
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:
  - (1) The potential to emit all PSD regulated pollutants are less than 250 tons per year,
  - (2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (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 from each of the emission units. Therefore, none of the emissions units are . 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), 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), the source is subject to this rule. .

- (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 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.
- (h) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

### **Natural Gas Combustion Units (NG1)**

#### **326 IAC 6.5 (Particulate Emission Limitations except Lake County)**

The PM emissions from this source are greater than 10 tons per year and this source is located in St. Joseph County. Therefore this emission unit is subject to 326 IAC 6.5-1-1(a)(2)(B) rule.

Pursuant to 326 IAC 6.5-1-1(a)(2)(B), Particulate matter emissions from facility shall not exceed (0.03) grain per dry standard cubic foot (dscf).

### **Putty Adhesive Mixing Units (M-1 - M-5)**

#### **326 IAC 6.5 (Particulate Emission Limitations Except Lake County)**

The PM emissions from this source are greater than 10 tons per year and this source is located in St. Joseph County. Therefore this emission unit is subject to 326 IAC 6.5-1-1(a)(2)(B) rule.

Pursuant to 326 IAC 6.5-1-1(a)(2)(B), Particulate matter emissions from facility shall not exceed (0.03) grain per dry standard cubic foot (dscf).

#### **326 IAC 8-1-6 (New facilities; general reduction requirements)**

Pursuant to 326 IAC 8-1-6, the adhesive mixing units are not subject to 326 IAC 8-1-6, since the potential VOC emissions are less than twenty-five (25) tons per year, each.

#### **326 IAC 8-22 (Miscellaneous Industrial Adhesives)**

Pursuant to 326 IAC 8-1-6, the adhesive mixing units are not subject to 326 IAC 8-22-1, since the facility is not located in Lake County or Porter County.

### **Paint Adhesive Mixing Units (M-9 - M-11)**

#### **326 IAC 6.5 (Particulate Emission Limitations Except Lake County)**

The PM emissions from this source are greater than 10 tons per year and this source is located in St. Joseph County. Therefore this emission unit is subject to 326 IAC 6.5-1-1(a)(2)(B) rule.

Pursuant to 326 IAC 6.5-1-1(a)(2)(B), Particulate matter emissions from facility shall not exceed 0.07 gram per dry standard cubic meter (g/dscm), (0.03) grain per dry standard cubic foot (dscf).

#### **326 IAC 8-1-6 (New facilities; general reduction requirements)**

Pursuant to 326 IAC 8-1-6, the adhesive mixing units are not subject to 326 IAC 8-1-6, since the potential VOC emissions are less than twenty-five (25) tons per year, each.

#### **326 IAC 8-22 (Miscellaneous Industrial Adhesives)**

Pursuant to 326 IAC 8-1-6, the adhesive mixing units are not subject to 326 IAC 8-22-1, since the

facility is not located in Lake County or Porter County.

**Putty Adhesive Mixing Units (M-6 - M-8)**

**326 IAC 6.5 (Particulate Emission Limitations Except Lake County)**

Pursuant to 326 IAC 6.5-1-1, Particulate matter emissions from facility shall not exceed 0.07 gram per dry standard cubic meter (g/dscm), (0.03) grain per dry standard cubic foot (dscf).

**326 IAC 8-1-6 (New facilities; general reduction requirements)**

Pursuant to 326 IAC 8-1-6, the adhesive mixing units are not subject to 326 IAC 8-1-6, since the potential VOC emissions are less than twenty-five (25) tons per year, each.

**326 IAC 8-22 (Miscellaneous Industrial Adhesives)**

Pursuant to 326 IAC 8-1-6, the adhesive mixing units are not subject to 326 IAC 8-22-1, since the facility is not located in Lake County or Porter County.

There are no other 326 IAC 8 Rules that are applicable to the unit.

**Compliance Determination, Monitoring and Testing Requirements**

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

<b>Emission Unit</b>	<b>Control</b>	<b>Operating Parameters</b>	<b>Frequency</b>	<b>Range</b>	<b>Excursions and Exceedances</b>
Mixing units (M-1 through M-5) and Adhesive Mixers (M-6 through M-11)	baghouse	Inspections	Semi-annual	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the baghouses for the mixing units (M-1 through M-5) and adhesive mixers (M-6 through M-11) must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Emissions Limitations Except Lake County).

- (b) There are no testing requirements included in this permit.

**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 February 2, 2016.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 141-36790-00034. The staff recommends to the Commissioner that this MSOP be approved.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Vasantha Palakurti 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) 234-4907 or toll free at 1-800-451-6027 extension 4-4907
- (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: Potential to Emit Summary**

**Company Name: Colorimetric**  
**Address City IN Zip: 1711 Clover Road, Mishawaka, Indiana 46545**  
**Permit Number: 141-36790-00034**  
**Permit Reviewer: Vasantha Palakurti**

**Unlimited PTE**

Process	Uncontrolled/Unlimited Emissions (tons/yr)Emit (tons/year)									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Single Highest HAP	
Paint Adhesive Mixing (M-9, M-10, M-11)	23.41	23.41	23.41	0.00	0.00	5.15	0.00	0.10	0.10	Ethylene Glycol
Putty Adhesive Mixing (M-1 - M-5)	14.98	14.98	14.98	0.00	0.00	0.00	0.00	0.00	0.00	
Putty Adhesive Mixing (M-6 - M-8)	14.98	14.98	14.98	0.00	0.00	0.00	0.00	0.00	0.00	
Space Heaters (NG1)	0.01	0.05	0.05	0.00	0.60	0.03	0.50	0.01	0.01	Hexane
<b>Totals</b>	<b>53.38</b>	<b>53.42</b>	<b>53.42</b>	<b>0.00</b>	<b>0.60</b>	<b>5.18</b>	<b>0.50</b>	<b>0.11</b>	<b>0.10</b>	<b>Ethylene Glycol</b>

**Appendix A: Emission Calculations**  
**Adhesive Production Area (M-9, M-10, M-11)**

**Company Name:** Colorimetric  
**Address City IN Zip:** 1711 Clover Road, Mishawaka, Indiana 46545  
**Permit Number:** 141-36790-00034  
**Permit Reviewer:** Vasantha Palakurti

**Adhesives Production Area (M-9, M-10, M-11)**

The adhesive manufacturing operations are conducted in batches. Each batch takes several hours to complete the mixing process. The solvent incorporated into these products are raw materials required to be maintained in the finished product for sale. The batched are mixed in closed mixers. Calculations are based on the throughput of the largest mixer and the worst case/highest solvent content product produced (Elastomeric).

Based on the document entitled "Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8, February 2005", total VOC emissions for overall operations from a paint manufacturing facility can be estimated by using an emission factor of 0.034 lb VOCs emitted/lb solvent used. In addition, the guidance document also indicates that the AP-42, Chapter 6.4 (Paint And Varnish), Table 6.4-1, emission factors are for plantwide emissions. Therefore, the combined VOC/PM emissions from Adhesive Mixing/Blending (M-9, M-10, M-11) are calculated as follows:

**Emission Factors and Worst Case Product Properties**

	VOC Emission Factor* (lb/lb of solvent)	HAP Emission Factor* (lb/lb of solvent)	PM/PM10/PM2.5 Emission Factor** (lb/ton of solids)
Adhesives Production Area (M-9, M-10, M-11)	0.034	0.034	20

**Unlimited Potential to Emit (PTE)**

Unlimited Throughput of Worst Case Product =	786	(lbs of product/hr)
Worst Case Weight % Solvent =	4.40%	(note: solvent assumed VOC and HAP (ethylene glycol))
Unlimited Throughput of Solvent =	34,584	(lbs of solvent/hr)
Worst Case Weight % Solids =	68.00%	
Unlimited Throughput of Solids =	534.48	(lbs of solids/hr)
**Weight percent Water =	33%	
Ethylene Glycol weight % Solvent	4%	

	Unlimited PTE of VOC (lbs/hr)	Unlimited PTE of VOC (tons/yr)	Unlimited PTE of Ethylene Glycol (tons/yr)	Unlimited PTE of Total HAPs (tons/yr)	Unlimited PTE of PM/PM10/PM2.5 (lbs/hr)	Unlimited PTE of PM/PM10/PM2.5 (tons/yr)
Solvent-Based Adhesives Production area (M-9, M-10, M-11)	1.18	5.15	0.10	0.10	5.34	23.41

**Methodology**

\*Emission Factor from Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8, February 2005. This document is currently available on the internet at: [http://www.epa.gov/ttn/chief/eiip/techreport/volume02/ii08\\_feb2005.pdf](http://www.epa.gov/ttn/chief/eiip/techreport/volume02/ii08_feb2005.pdf)

\*\*Emission Factors from AP-42, Chapter 6.4 (Paint And Varnish), Table 6.4-1

\*\*\*PM10 and PM2.5 emissions assumed equal to PM emissions

Unlimited Throughput of Solvent (lbs of solvent/hr) = [Unlimited Throughput of Worst Case Product (lbs of product/hr)] \* [Worst Case Weight % Solvent]

Unlimited Throughput of Solids (lbs of solids/hr) = [Unlimited Throughput of Worst Case Product (lbs of product/hr)] \* [Worst Case Weight % Solids]

Unlimited PTE of VOC (lbs/hr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [VOC Emission Factor (lb/lb of solvent)]

Unlimited PTE of VOC (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [VOC Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]

Unlimited PTE of Toluene (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]

Unlimited PTE of Total HAPs (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]

Unlimited PTE of PM/PM10/PM2.5 (lbs/hr) = [Unlimited Throughput of Solids (lbs of solids/hr)] \* [PM/PM10/PM2.5 Emission Factor (lb/ton of solids)] \* [ton/2000 lbs]

Unlimited PTE of PM/PM10/PM2.5 (tons/yr) = [Unlimited PTE of PM/PM10/PM2.5 (lbs/hr)] \* [8760 hours/yr] \* [ton/2000 lbs]

**Appendix A: Emissions Calculations  
Existing Adhesive Production Area (M-1 through M-5)**

Page3 of 6 TSD App A

**Company Name:** Colorimetric  
**Address City IN Zip:** 1711 Clover Road, Mishawaka, Indiana 46545  
**Permit Number:** 141-36790-00034  
**Permit Reviewer:** Vasantha Palakurti

**Adhesives Production Area (M-1 - M-5)**

The adhesive manufacturing operations are conducted in batches. Each batch takes several hours to complete the mixing process. The batches are mixed in closed mixers. Calculations are based on the throughput of the largest mixer and the worst case product produced (P2000).

Based on the document entitled "Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8, February 2005", total VOC emissions for overall operations from a paint manufacturing facility can be estimated by using an emission factor of 0.034 lb VOCs emitted/lb solvent used. In addition, the guidance document also indicates that the AP-42, Chapter 6.4 (Paint And Varnish), Table 6.4-1, emission factors are for plantwide emissions. Therefore, the combined VOC/PM emissions from Adhesive Mixing/Blending (M-1 through M-5) are calculated as follows:

**Emission Factors and Worst Case Product Properties**

Emission Units	VOC Emission Factor* (lb/lb of solvent)	HAP Emission Factor* (lb/lb of solvent)	PM/PM10/PM2.5 Emission Factor** (lb/ton of solids)
Adhesives Production Area (M-1 - M-5)	0.034	0.034	20

**Unlimited Potential to Emit (PTE)**

Unlimited Throughput of Worst Case Product =	342	(lbs of product/hr)
Worst Case Weight % Solvent =	0.00%	(note: solvent assumed VOC and HAP (ethylene glycol))
Unlimited Throughput of Solvent =	0	(lbs of solvent/hr)
Worst Case Weight % Solids =	100.00%	
Unlimited Throughput of Solids =	342	(lbs of solids/hr)
**Weight percent Water=	0%	

Emission Units	Unlimited PTE of VOC (lbs/hr)	Unlimited PTE of VOC (tons/yr)	Unlimited PTE of Ethylene Glycol (tons/yr)	Unlimited PTE of Total HAPs (tons/yr)	Unlimited PTE of PM/PM10/PM2.5 (lbs/hr)	Unlimited PTE of PM/PM10/PM2.5 (tons/yr)
Adhesives Production area (M-1 - M-5)	0.00	0.00	0.00	0.00	3.42	14.98

**Methodology**

\*Emission Factor from Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8, February 2005. This document is currently available on the internet at: [http://www.epa.gov/ttn/chief/eiip/techreport/volume02/ii08\\_feb2005.pdf](http://www.epa.gov/ttn/chief/eiip/techreport/volume02/ii08_feb2005.pdf)

\*\*Emission Factors from AP-42, Chapter 6.4 (Paint And Varnish), Table 6.4-1

\*\*\*PM10 and PM2.5 emissions assumed equal to PM emissions

Unlimited Throughput of Solvent (lbs of solvent/hr) = [Unlimited Throughput of Worst Case Product (lbs of product/hr)] \* [Worst Case Weight % Solvent]

Unlimited Throughput of Solids (lbs of solids/hr) = [Unlimited Throughput of Worst Case Product (lbs of product/hr)] \* [Worst Case Weight % Solids]

Unlimited PTE of VOC (lbs/hr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [VOC Emission Factor (lb/lb of solvent)]

Unlimited PTE of VOC (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [VOC Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]

Unlimited PTE of Toluene (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]

Unlimited PTE of Total HAPs (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]

Unlimited PTE of PM/PM10/PM2.5 (lbs/hr) = [Unlimited Throughput of Solids (lbs of solids/hr)] \* [PM/PM10/PM2.5 Emission Factor (lb/ton of solids)] \* [ton/2000 lbs]

Unlimited PTE of PM/PM10/PM2.5 (tons/yr) = [Unlimited PTE of PM/PM10/PM2.5 (lbs/hr)] \* [8760 hours/yr] \* [ton/2000 lbs]

**Appendix A: Emission Calculations  
Adhesive Production Area (M-6, M-7, M-8)**

**Company Name:** Colorimetric  
**Address City IN Zip:** 1711 Clover Road, Mishawaka, Indiana 46545  
**Permit Number:** 141-36790-00034  
**Permit Reviewer:** Vasantha Palakurti

**Adhesives Production Area (M-6, M-7, M-8)**

The adhesive manufacturing operations are conducted in batches. Each batch takes several hours to complete the mixing process. The batches are mixed in closed mixers. Calculations are based on the throughput of the largest mixer and the worst case product produced (P2000).

Based on the document entitled "Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8, February 2005", total VOC emissions for overall operations from a paint manufacturing facility can be estimated by using an emission factor of 0.034 lb VOCs emitted/lb solvent used. In addition, the guidance document also indicates that the AP-42, Chapter 6.4 (Paint And Varnish), Table 6.4-1, emission factors are for plantwide emissions. Therefore, the combined VOC/PM emissions from Adhesive Mixing/Blending (M-6, M-7, M-8) are calculated as follows:

**Emission Factors and Worst Case Product Properties**

Emission Units	VOC Emission Factor* (lb/lb of solvent)	HAP Emission Factor* (lb/lb of solvent)	PM/PM10/PM2.5 Emission Factor** (lb/ton of solids)
Adhesives Production Area (M-6, M-7, M-8)	0.034	0.034	20

**Unlimited Potential to Emit (PTE)**

Unlimited Throughput of Worst Case Product =	342	(lbs of product/hr)
Worst Case Weight % Solvent =	0.00%	(note: solvent assumed VOC and HAP (ethylene glycol))
Unlimited Throughput of Solvent =	0	(lbs of solvent/hr)
Worst Case Weight % Solids =	100.00%	
Unlimited Throughput of Solids =	342	(lbs of solids/hr)
**Weight percent Water=	0%	

Emission Units	Unlimited PTE of VOC (lbs/hr)	Unlimited PTE of VOC (tons/yr)	Unlimited PTE of Ethylene Glycol (tons/yr)	Unlimited PTE of Total HAPs (tons/yr)	Unlimited PTE of PM/PM10/PM2.5 (lbs/hr)	Unlimited PTE of PM/PM10/PM2.5 (tons/yr)
Adhesives Production area (M-6, M-7, M-8)	0.00	0.00	0.00	0.00	3.42	14.98

**Methodology**

\*Emission Factor from Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, Volume II: Chapter 8, February 2005. This document is currently available on the internet at: [http://www.epa.gov/ttn/chief/eiip/techreport/volume02/ii08\\_feb2005.pdf](http://www.epa.gov/ttn/chief/eiip/techreport/volume02/ii08_feb2005.pdf)

\*\*Emission Factors from AP-42, Chapter 6.4 (Paint And Varnish), Table 6.4-1

\*\*\*PM10 and PM2.5 emissions assumed equal to PM emissions

Unlimited Throughput of Solvent (lbs of solvent/hr) = [Unlimited Throughput of Worst Case Product (lbs of product/hr)] \* [Worst Case Weight % Solvent]

Unlimited Throughput of Solids (lbs of solids/hr) = [Unlimited Throughput of Worst Case Product (lbs of product/hr)] \* [Worst Case Weight % Solids]

Unlimited PTE of VOC (lbs/hr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [VOC Emission Factor (lb/lb of solvent)]

Unlimited PTE of VOC (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [VOC Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]

Unlimited PTE of Toluene (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]

Unlimited PTE of Total HAPs (tons/yr) = [Unlimited Throughput of Solvent (lbs of solvent/hr)] \* [HAP Emission Factor (lb/lb of solvent)] \* [8760 hours/yr] \* [ton/2000 lbs]

Unlimited PTE of PM/PM10/PM2.5 (lbs/hr) = [Unlimited Throughput of Solids (lbs of solids/hr)] \* [PM/PM10/PM2.5 Emission Factor (lb/ton of solids)] \* [ton/2000 lbs]

Unlimited PTE of PM/PM10/PM2.5 (tons/yr) = [Unlimited PTE of PM/PM10/PM2.5 (lbs/hr)] \* [8760 hours/yr] \* [ton/2000 lbs]

**Appendix A: Process Particulate Emissions**  
**Mix Line (M-6 - M-11) Adhesive Mixing Activities**  
**Company Name: Colorimetric**  
**Address City IN Zip: 1711 Clover Road, Mishawaka, Indiana 46545**  
**Permit Number: 141-36790-00034**  
**Permit Reviewer: Vasantha Palakurti**

Uncontrolled/Controlled Potential Emissions (tons/year)							
DUST COLLECTOR							
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (tons/yr)	Controlled Emissions (Tons/yr)
BH3 - BH 6	6	0.003	1000.0	1	99.00%	67.58	0.68
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						<b>67.58</b>	<b>0.68</b>

Allowable  $E_r 4.10 X [\text{Process Weight Rate}]^{0.67} = 1.0$

**Methodology:**

**Potential Emission (uncontrolled):**

Potential Emission(tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)

**Potential Emission (controlled):**

Potential Emission (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Seven (7) Natural Gas Space Heaters (NG1)**

**Company Name:** Colorimetric  
**Address City IN Zip:** 1711 Clover Road, Mishawaka, Indiana 46545  
**Permit Number:** 141-36790-00034  
**Permit Reviewer:** Vasantha Palakurti

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.4	1020	12.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.01	0.05	0.05	0.00	0.60	0.03	0.50

\*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	1.3E-05	7.2E-06	4.5E-04	0.01	2.0E-05	<b>0.01</b>

	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	3.0E-06	6.6E-06	8.4E-06	2.3E-06	1.3E-05	<b>3.3E-05</b>
					<b>Total HAPs</b>	<b>0.01</b>
					<b>Worst HAP</b>	<b>0.01</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

*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

March 17, 2016

Mr. Mike Glasgow  
Colorimetric  
1711 Clover Road  
Mishawaka, Indiana 46545

Re: Public Notice  
Colorimetric  
Permit Level: MSOP – Transition from Registration  
Permit Number: 141-36790

Dear Mr. Glasgow:

Enclosed is a copy of your draft MSOP – Transition from Registration, 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 South Bend Tribune in South Bend, Indiana publish the abbreviated version of the public notice no later than March 20, 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 Mishawaka Penn-Harris Public Library, 209 Lincoln Way East in Mishawaka, 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 Vasantha Palakurti, 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 4-4907 or dial (317) 234-4907.

Sincerely,

*Vicki Biddle*

Vicki Biddle  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



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Commissioner

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

March 17, 2016

South Bend Tribune  
225 West Colfax Avenue  
South Bend, Indiana 46625

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Colorimetric, St. Joseph 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 March 20, 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 Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

*Vicki Biddle*

Vicki Biddle  
Permit Branch  
Office of Air Quality

Permit Level: MSOP-Transition from Registration  
Permit Number: 141-36790-00034

Enclosure

PN Newspaper.dot 2/17/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

March 14, 2016

To: Mishawaka Penn-Harris 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: Colorimetric**  
**Permit Number: 141-36790-00034**

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

**March 17, 2016**  
**Colorimetric**  
**141-36790-00034**

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	VBIDDLE 3/17/2016 Colorimetric 141-36790-00034 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		Mike Glasgow Colorimetric 1711 Clover Rd Mishawaka IN 46545 (Source CAATS)										
2		Patrick Phillips VP Colorimetric 58263 Charlotte Ave Elkhart IN 46517 (RO CAATS)										
3		Mishawaka City Council and Mayors Office 600 E. 3rd Street Mishawaka City Hall Mishawaka IN 46546 (Local Official)										
4		Mishawaka Penn Public Library 209 Lincoln Way E Mishawaka IN 46544-2084 (Library)										
5		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
6		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)										
7		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 (Health Department)										
8		Polly Mishler D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
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13												
14												
15												

Total number of pieces Listed by Sender  <b>8</b>	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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