



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Source Modification and
Significant Permit Modification to a
Part 70 Operating Permit

for Matthews Aurora, LLC in
Dearborn County

Significant Source Modification No. 029-36767-00001
Significant Permit Modification No. 029-36898-00001

The Indiana Department of Environmental Management (IDEM) has received an application from Matthews Aurora, LLC, located at 10944 Marsh Road, Aurora, Indiana 47001, for a significant modification of its Part 70 Operating Permit issued on June 6, 2013. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Matthews Aurora, LLC to make certain changes at its existing source. Matthews Aurora, LLC has applied for a source modification relating to units that were constructed in 2012 and operated without the proper air permit.

IDEM is aware that the describe facility has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit type 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:

Aurora Public Library
414 Second Street
Aurora, Indiana 47001

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

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

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public

meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM No. 029-36767-00001 and SPM No.029-36898-00001 in all correspondence.

Comments should be sent to:

Aida DeGuzman
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-4972
Or dial directly: (317) 233-4972
Fax: (317) 232-6749 attn: Aida DeGuzman
E-mail: adeguzma@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Aida DeGuzman or my staff at the above address.



Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality



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Mr. Larry Mabry
Matthews Aurora, LLC
10944 Marsh Road
Aurora, Indiana 47001

Re: 029-36898-00001
Significant Permit Modification to
Part 70 Renewal No.: T029-32454-00001

Dear Mr. Mabry:

Matthews Aurora, LLC was issued Part 70 Operating Permit Renewal No. T029-32454-00001 on June 6, 2013 for a stationary metal and wooden burial casket manufacturing operation, located at 10944 Marsh Road, Aurora, Indiana 47001. An application requesting changes to this permit was received on January 27, 2016. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR 63, Subpart Mmmm - Miscellaneous Metal Parts and Products Surface Coating

Previously issued approvals for this source containing this attachment are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

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If you have any questions on this matter, please contact Aida DeGuzman, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-4972 or 1-800-451-6027, and ask for extension 3-4972.

Sincerely,

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Dearborn County
Dearborn County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Southeast Regional Office



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Matthews Aurora, LLC
10944 Marsh Road
Aurora, Indiana 47001**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T029-32454-00001	
Issued by: Original Signed Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 6, 2013 Expiration Date: June 6, 2018
Administrative Amendment No.: 029-36273-00001, issued on September 30, 2015	
Significant Permit Modification No.: T029-36898-00001	
Issued by: Josiah Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: June 6, 2018

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- (h) One (1) metal surface coating booth, identified as MRA/Inspection, constructed in 1969, using dry filters to control particulate matter (PM) emissions, and exhausting through one (1) stack (8A).

Under 40 CFR 63, Subpart M, the surface coating spray booths, identified as EU-1 through EU-8, are considered affected facilities.

- (i) One (1) diesel fuel storage tank, installed in August 1990, with a maximum capacity of 20,000 gallons.
- (j) One (1) casket lid coat stripping operation, constructed in 2012, and permitted in 2016, with a maximum throughput rate of 12 units per hour, with no control.
- (k) One (1) pillow cotton filling operation, approved in 2016 for construction, with a maximum usage rate of 1,662.5 pounds per day, exhausting to the roof, with no control.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, with rod or wire usage of less than 625 pounds per day.
- (b) Paved and unpaved roads and parking lots with public access.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; and pneumatic conveying.
- (d) Other activities or categories not previously identified:
 - (1) Glue table
 - (2) Rope sealer
 - (3) A six (6) stage washer
 - (4) Miscellaneous machining
- (e) Natural gas-fired combustion sources with a combined maximum heat input capacity equal to or less than ten million (10,000,000) Btu per hour.
- (f) One (1) degreasing operation, identified as PC1, 2, 3 constructed in 2007, and permitted in 2016, with a maximum throughput rate of 130 gallons/year, with no control.
- (g) One (1) acetone underground horizontal storage tank, identified as Tank 001 UST, with a capacity of 6,000 gallons, constructed in 1990.
- (h) One (1) gasoline underground horizontal storage tank, identified as Tank 002 UST with a capacity of 6,000 gallons, constructed in 1990 and gasoline dispensing unit associated with the gasoline Tank 002 UST.

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- (i) One (1) acetone vertical storage tank, identified as AST Thinner Tank, with a capacity of 3,000 gallons, constructed in 1970.
- (j) One (1) electric infrared low temperature oven, identified as EU-11.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T029-32454-00001, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

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- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

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

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

The Permittee shall implement the PMPs.

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

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(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T029-32454-00001 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this combined new source review and part operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or

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anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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
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- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes

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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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

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SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

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

C.1 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.2 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.3 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.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 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

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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
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The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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.

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Testing Requirements [326 IAC 2-7-6(1)]

C.6 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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.7 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.9 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.10 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.11 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.12 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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;

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The emission statement 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.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

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

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following:

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

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

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

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- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]
[326 IAC 2-3]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a

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"responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) scratch primer/sealer booth, identified as EU-1, with a maximum capacity of 40 burial caskets per hour, waterwash curtain replaced in 2012 with dry filters for overspray control and exhausting to stack 1A.
- (c) One (1) color booth, identified as EU-4, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 4A and 4D.
- (d) One (1) shade booth, identified as EU-5, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 5A and 5B.
- (e) One (1) topcoat booth, identified as EU-6, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stack 6A.
- (f) One (1) touchup booth, identified as EU-7, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stack 7A.
- (g) One (1) inspection/repair booth, identified as EU-8, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stacks 8A and 8B.
- (h) One (1) metal surface coating booth, identified as MRA/Inspection, constructed in 1969, using dry filters to control particulate matter (PM) emissions, and exhausting through one (1) stack (8A).

Under 40 CFR 63, Subpart M, the surface coating spray booths, identified as EU-1 through EU-8, are considered affected facilities.

(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 2-7-5(1)]

D.1.1 Particulate Matter (PM) Limitations Except Lake County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County), the particulate from the spray coating operation shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.1.3 Compliance Determination [326 IAC 2-7-5(1)]

In order to comply with Condition D.1.1, the control devices for each surface coating unit shall be in operation at all times that each surface coating unit is operating.

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Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.4 Dry Filter Monitoring [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 1A, 1B, 4A through 4D, 5A, 5B, 6A, 7A, 8A, and 8B, while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.5 Water Wash Monitoring [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks 1A, 2A and 2B, 4A through 4D, 5A and 5B, and 6A (associated with EU-1, EU-2, EU-4, EU-5 and EU-6, respectively) and surface coating booth stacks 1A and 1B, 2A and 2B, 4A and 4B (associated with surface coating line -1) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirement[326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- (a) To document the compliance status with Conditions D.1.4 and D.1.5, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections.
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligation with regard to the record keeping required by this condition.

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; and pneumatic conveying.

(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 2-7-5(1)]

D.2.1 Particulate Matter (PM) Limitations Except Lake County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County), the particulate from the grinding and machining operations shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) primer booth identified as EU-3, constructed in 2012 and permitted in 2016, with a maximum throughput rate of 40 burial caskets per hour, using dry filters for overspray control, exhausting through stack S3-C.

[Under 40 CFR 63, Subpart Mmmm, the surface coating spray booth, identified as EU-3 is considered affected facilities].

- (k) One (1) pillow cotton filling operation, approved in 2016 for construction, with a maximum usage rate of 1,662.5 pounds per day, exhausting to the roof, with no control.

Insignificant activities:

- (f) One (1) degreasing operation, identified as PC1, 2, 3 constructed in 2012, and permitted in 2016, with a maximum throughput rate of 130 gallons/year, with no control.
- (g) One (1) acetone underground horizontal storage tank, identified as Tank 001 UST, with a capacity of 6,000 gallons, constructed in 1990.
- (h) One (1) gasoline underground horizontal storage tank, identified as Tank 002 UST with a capacity of 6,000 gallons, constructed in 1990 and gasoline dispensing unit associated with the gasoline Tank 002 UST.

(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 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) Minor Limit [326 IAC 2-2] [326 IAC 8-1-6]

The input VOC, including coatings, dilution solvents and cleaning solvents to the primer booth, identified as EU-3 shall not exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit combined with the potential to emit VOC from other emission units in this 2016 source modification shall limit the VOC emissions to less than 40 tons per twelve consecutive month period and satisfies the requirements of 326 IAC 2-2 (PSD) and also render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to primer booth, identified as EU-3.

D.3.2 Particulate Matter (PM) Limitations Except Lake County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the pillow filling operation shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

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D.3.3 Particulate Matter (PM) Limitations Except Lake County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(h) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the primer booth, identified as EU-3 shall be controlled dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (1) The source shall operate the control device in accordance with manufacturer's specifications.

D.3.4 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

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

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D.3.5 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-4-6]

Pursuant to 326 IAC 8-4-6 (Gasoline Dispensing Facilities):

- (a) The gasoline dispensing facility associated with the gasoline storage tank, identified as Tank 002 UST is subject to the following requirements:
 - (1) No owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless the tank is equipped with the following:
 - (A) A submerged fill pipe that extends to not more than:
 - (i) twelve (12) inches from the bottom of the storage tank if the fill pipe was installed on or before November 9, 2006; or
 - (ii) six (6) inches from the bottom of the storage tank if the fill pipe was installed after November 9, 2006.
 - (B) Either a pressure relief valve set to release at not less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.
 - (C) A vapor balance system connected between the tank and the transport operating according to manufacturer's specifications.
 - (2) If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is:
 - (A) connected between the transport and the storage tank; and
 - (B) operating according to manufacturer's specifications.

D.3.7 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.3.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.9 Particulate Control [326 IAC 2-7-6(6)]

In order to ensure compliance with Condition D.3.2, the dry filters for particulate control shall be in place and in operation and control emissions from the primer booth, identified as EU-3 at all times that this booth is in operation.

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Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.3.10 Monitoring [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the primer booth, EU-3 stack while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response.
- (c) Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.11 Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- (a) To document the compliance status with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limit established in Condition 3.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC usage for each month.
 - (5) The total VOC usage for each compliance period.
- (b) To document the compliance status with Condition D.3.5, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.

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- (4) The total volume of the solvent purchased.
- (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) To document the compliance status with Condition D.3.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.3.12 Reporting Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-19]

A quarterly summary of the information to document the compliance status with Condition D.3.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

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NESHAP

SECTION E.1

Emissions Unit Description:

- (a) One (1) scratch primer/sealer booth, identified as EU-1, with a maximum capacity of 40 burial caskets per hour, waterwash curtain replaced in 2012 with dry filters for overspray control and exhausting to stack 1A.
- (b) One (1) primer booth identified as EU-3, constructed in 2012 and permitted in 2016, with a maximum throughput rate of 40 burial caskets per hour, using dry filters for overspray control, exhausting through stack S3-C.
- (c) One (1) color booth, identified as EU-4, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 4A and 4B.
- (d) One (1) shade booth, identified as EU-5, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 5A and 5B.
- (e) One (1) topcoat booth, identified as EU-6, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stack 6A.
- (f) One (1) touchup booth, identified as EU-7, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stack 7A.
- (g) One (1) inspection/repair booth, identified as EU-8, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stacks 8A and 8B.
- (h) One (1) metal surface coating booth, identified as MRA/Inspection, constructed in 1969, using dry filters to control particulate matter (PM) emissions, and exhausting through one (1) stack (8A).

Under 40 CFR 63, Subpart M, the surface coating spray booths, identified as EU-1 through EU-8, and the Hardware Color Booth are considered affected facilities.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR,63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1 for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart M.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 Miscellaneous Metal Parts and Products Surface Coating NESHAP [40 CFR 63, Subpart MMMM]
[326 IAC 20-80]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart MMM (included as Attachment A to this operating permit), which are incorporated by referenced as 326 IAC 20-80 for the emission units listed above:

- (1) 40 CFR 63.3880
- (2) 40 CFR 63.3881(a)(1), (a)(2) and (b)
- (3) 40 CFR 63.3882
- (4) 40 CFR 63.3883(b) and (d)
- (5) 40 CFR 63.3890(b)(1)
- (6) 40 CFR 63.3891(b)
- (7) 40 CFR 63.3892(a)
- (8) 40 CFR 63.3893(a)
- (9) 40 CFR 63.3900(a)(1), (b)
- (10) 40 CFR 63.3901
- (11) 40 CFR 63.3910
- (12) 40 CFR 63.3920
- (13) 40 CFR 63.3930
- (14) 40 CFR 63.3931
- (15) 40 CFR 63.3950
- (16) 40 CFR 63.3951
- (17) 40 CFR 63.3952
- (18) 40 CFR 63.3980
- (19) 40 CFR 63.3981
- (20) Table 2 to Subpart MMMM of Part 63—Applicability of General Provisions to Subpart MMMM of Part 63
- (21) Table 3 to Subpart MMMM of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends,
- (22) Table 4 to Subpart MMMM of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups ^a

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Mathews Aurora, LLC
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Part 70 Permit No.: T029-32454-00001

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Matthews Aurora, LLC
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Part 70 Permit No.: T029-32454-00001

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING
REPORT**

Source Name: Matthews Aurora, LLC
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Part 70 Permit No.: T029-32454-00001

Months: _____ to _____ Year: _____

Page 1 of 2

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

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Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Mathews Aurora, LLC
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Part 70 Permit No.: T029-32454-00001
Facilities: Primer Booth, identified as EU-3
Parameter: VOC Emissions
Limit: Shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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

**Technical Support Document (TSD) for a Part 70 Significant Source
Modification and Significant Permit Modification**

Source Description and Location

Source Name:	Matthews Aurora, LLC
Source Location:	10944 Marsh Road, Aurora, Indiana 47001
County:	Dearborn (Washington Township)
SIC Code:	3995 (Burial Caskets)
Operation Permit No.:	T029-32454-00001
Operation Permit Issuance Date:	June 6, 2013
Significant Source Modification No.:	029-36767-00001
Significant Permit Modification No.:	029-36898-00001
Permit Reviewer:	Aida DeGuzman

Existing Approvals

The source was issued Part 70 Operating Permit No. T029-32454-00001 on June 6, 2013. The source has since received the following approval:

- (a) Administrative Amendment No. 029- 36273-00001, issued on September 30, 2015.

County Attainment Status

The source is located in Dearborn County (Washington Township).

Pollutant	Designation
SO ₂	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Nonattainment effective July 20, 2012, for the 2008 8-hour ozone standard for Lawrenceburg Township. Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard for the remainder of the county. ¹
PM _{2.5}	Attainment effective December 23, 2011, for the annual PM2.5 standard for Lawrenceburg Township. Unclassifiable or attainment effective April 5, 2005, for the annual PM2.5 standard for the remainder of the county.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM2.5 standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

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

- (b) **PM_{2.5}**
Dearborn County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Dearborn County has been classified as attainment or unclassifiable in Indiana for PM, PM10, SO₂, NO_x and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (ton/yr)
PM	3.05
¹ PM ₁₀	3.05
¹ PM _{2.5}	3.05
SO ₂	0.03
NO _x	4.29
VOC	626.65
CO	3.61
HAPs	
Xylene	170.39
Hexane	0.08
Total	327.6

¹The existing units prior to this 2016 source modification were constructed in 1969. Therefore they are grandfathered for PSD rules (8/7/1977). In addition PM10 and PM2.5 were not regulated pollutants at the time these units were constructed.

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

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

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) These emissions are based upon Page 1 of 5 TSD App A for Renewal No. T 029-32454-00001.
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Matthews Aurora, LLC on January 27, 2016, relating to units that were constructed and operated without the proper air permit. The following is a list of the emission units and pollution control devices:

- (a) One (1) primer booth identified as EU-3, constructed in 2012 and permitted in 2016, with a maximum throughput rate of 40 burial caskets per hour, using dry filters for overspray control, exhausting through stack S3-C.

Note: This booth totally replaced the existing primer booth identified as EU-3.
- (b) One (1) casket lid coat stripping operation, constructed in 1993, and permitted in 2016, with a maximum throughput rate of 12 units per hour, with no control.
- (c) One (1) degreasing operation, identified as PC1, 2, 3 constructed in 2007, and permitted in 2016, with a maximum throughput rate of 130 gallons/year, with no control.
- (d) One pillow cotton filling operation, approved in 2016 for construction, with a maximum usage rate of 1,662.5 pounds per day, with no control.
- (e) One (1) scratch primer/sealer booth, identified as EU-1, with a maximum capacity of 40 burial caskets per hour, constructed in 1969, waterwash curtain replaced in 2012 with dry filters for overspray control and exhausting to stack 1A.
- (f) One (1) electric infrared low temperature oven, identified as EU-11.
- (g) One (1) acetone underground horizontal storage tank, identified as Tank 001 UST, with a capacity of 6,000 gallons, constructed in 1990.
- (h) One (1) gasoline underground horizontal storage tank, identified as Tank 002 UST with a capacity of 6,000 gallons, constructed in 1990 and gasoline dispensing unit associated with the gasoline Tank 002UST.
- (i) One (1) acetone vertical storage tank, identified as AST Thinner Tank, with a capacity of 3,000 gallons, constructed in 1970.

Enforcement Issues

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

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	15.45
PM ₁₀	15.45
PM _{2.5}	15.45
SO ₂	0.0
VOC	50.27
CO	0
NO _x	0
Single HAPs (Toluene)	1.79
Total HAPs	1.79

Page 4 of 5 Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

Note: The total replacement of paint booth EU-3 did not affect the existing upstream and downstream processes.

This source modification is subject to 326 IAC 2-7-10.5(g)(4), since it has VOC potential to emit greater than or equal to 25 tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1) because the permit modification requires a case-by-case determination of an emission limitation to avoid the applicability of 2-2 (PSD) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Project Emissions (tons/year)								
Process / Emission Unit	PM	PM ₁₀	PM _{2.5} [*]	SO ₂	NO _x	VOC	CO	HAPs
Degreasing Operation, PC 1, 2, 3	0.0	0.0	0.0	0.0	0.0	0.53	0.0	0.0
Casket Lid Coat Stripping	0.0	0.0	0.0	0.0	0.0	4.59	0.0	1.79 Toluene
Pillow Filling	3.95	3.95	3.95	0.0	0.0	0.0	0.0	0.0
Two (2) Storage Tanks, Tank 001 UST and Tank 002 UST	0.0	0.0	0.0	0.0	0.0	0.29	0.0	0.0
Primer booth, EU-3	0.08	0.08	0.08	0.0	0.0	24.5	0.0	0.0
Total for Modification	4.03	4.03	4.03	0.0	0.0	29.92	0.0	1.79 Toluene
Significant Thresholds	25	15	10	40	40	40	100	NA

*PM_{2.5} listed is direct PM_{2.5}.

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

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

- (a) Since the source is an existing major PSD source and the unrestricted potential to emit of this modification is greater than 40 tons of VOC per year, this source modification potential to emit is limited to less than 40 tons per year to render 326 IAC 2-2, PSD not applicable. The limitation is as follows:

Volatile Organic Compounds (VOC) PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the input VOC, including coatings, dilution solvents and cleaning solvents to the primer booth, identified as EU-3 shall not exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit combined with the potential to emit VOC from other emission units in this 2016 modification shall limit the VOC emissions to less than 40 tons per twelve consecutive month period and satisfies the requirements of 326 IAC 2-2 (PSD) and also render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to primer booth, identified as EU-3.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS):

- (a) 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

This rule applies to each storage vessel with a capacity greater than or equal to 75 cubic meters (19,813 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

The two (2) storage tanks, identified as Tank 001 UST storing acetone and Tank 002 UST storing gasoline are not subject to 40 CFR 60, Subpart Kb because each tank has a capacity of 6,000 gallons which is less than 19,813 gallons.

- (b) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

National Emissions Standard for Hazardous Air Pollutants (NESHAP)

- (c) 40 CFR Part 63, Subpart Mmmm - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Metal Parts and Products Surface Coating Operations

This rule applies to miscellaneous metal parts and products surface coating facilities, which include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and numerous other industrial, household, and consumer products. Except as provided in paragraph (c) of this section, the source category to which this subpart applies is the surface coating of any miscellaneous metal parts or products, as described in paragraph (a)(1) of this section, and it includes the subcategories listed in paragraphs (a)(2) through (6) of this section.

The primer booth, identified as EU-3 which coats metal caskets is subject to the following portions of 40 CFR 60, Subpart Mmmm:

- (1) 40 CFR 63.3880
- (2) 40 CFR 63.3881(a)(1), (a)(2) and (b)
- (3) 40 CFR 63.3882
- (4) 40 CFR 63.3883(b) and (d)
- (5) 40 CFR 63.3890(b)(1)
- (6) 40 CFR 63.3891(b)
- (7) 40 CFR 63.3892(a)
- (8) 40 CFR 63.3893(a)
- (9) 40 CFR 63.3900(a)(1), (b)
- (10) 40 CFR 63.3901
- (11) 40 CFR 63.3910
- (12) 40 CFR 63.3920
- (13) 40 CFR 63.3930
- (14) 40 CFR 63.3931
- (15) 40 CFR 63.3950
- (16) 40 CFR 63.3951
- (17) 40 CFR 63.3952
- (18) 40 CFR 63.3980

- (19) 40 CFR 63.3981
- (20) Table 2 to Subpart M of Part 63—Applicability of General Provisions to Subpart M of Part 63
- (21) Table 3 to Subpart M of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends,
- (22) Table 4 to Subpart M of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups ^a

The provisions of 40 CFR 63 Subpart A – General Provisions, which are in Table 2 to Subpart M of Part 63 and incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart M.

- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Pillow Filling (PM)	None	Y	3.95	3.95	100	N	NA
Pillow Filling (PM10/PM2.5)	None	N	3.95	3.95	100	N	NA
Primer booth, identified as EU-3 (PM, PM10, PM2.5)	Dry Filter	N	11.5	0.08	100	N	NA
Primer booth, identified as EU-3 (VOC)	None	Y	44.85	44.85	100	N	NA
Degreasing Operation, PC 1-3 (VOC)	None	N	0.53	0.53	100	N	NA
Casket Lid Washing (VOC)	None	N	4.59	4.59	100	N	NA
Casket Lid Coat Stripping (Single HAP)	None	N	1.79	1.79	10	N	NA

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

326 IAC 2-2 (PSD)

The source has been in operation prior to the promulgation of PSD Rules (326 IAC 2-2) on August 7, 1977. The source is an existing major source, emitting VOC above 250 tons per year. Therefore, all modification made after August 7, 1977 must be evaluated under PSD rules.

The main emission unit, EU3 in this proposed source modification was constructed and operated in 2012 without the proper air permit. PSD applicability for this source modification is discussed under the Permit Level Determination – PSD section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of casket lid coat stripping will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)

This rule applies to sources or facilities located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne that are not specifically limited in 326 IAC 6.5-2 through 326 IAC 6.5-10, but has:

- (1) the potential to emit one hundred (100) tons or more; or
- (2) actual emissions of ten (10) tons or more; of particulate matter per year.

The source is subject to 326 IAC 6.5 because it is located in Dearborn County, its PM PTE is equal to or greater than 100 tons/year, or its actual emissions are greater than 10 tons/year.

- (a) Primer booth, identified as EU-3 - This unit is subject to 326 IAC 6.5-1-2(h), which requires that this unit be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:
- (1) The source shall operate the control device in accordance with manufacturer's specifications.
- (b) The pillow filling - Pursuant to 326 IAC 6.5-1-2(a) the PM emissions from pillow filling which is uncontrolled, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

This unit PTE was calculated based on worst case using mass balance. All the weight loss from the cotton used was assumed emitted, although cotton fibers only escape through gaps in the fill machine during cleaning and manual loading. Based on this, it is assumed that almost no PM is actually exhausted and therefore in compliance with the 0.03 dscf outlet grain loading limit. This unit has no control device.

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

The Primer booth, identified as EU-3, and the pillow filling operation are not subject to the requirements of 326 IAC 6-3-2 because these units are subject to 326 IAC 6.5, which is a more stringent limit. Therefore, pursuant to 326 IAC 6-3-1(c)(3), these units are exempt from 326 IAC 6-3-2.

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

This source is a burial casket manufacturing operation, with a Standard Industrial Classification (SIC) Code of 3995. The source is located in Dearborn County, in Washington Township. This township has been designated as attainment for ozone, and is not adjacent to Lawrenceburg Township. (See County Attainment Status section above for more details). Pursuant to 326 8-2-9(b)(6), the surface coating operation for burial caskets with SIC Code 3995, that is not located in or adjacent to a nonattainment area for ozone, is exempt from the requirements of 326 IAC 8-2-9.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This rule requires that new facilities (as of January 1, 1980), which have potential VOC emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8, shall reduce VOC emissions using Best Available Control Technology (BACT).

- (a) The Primer booth, identified as EU-3, constructed in 2012 is subject to 326 IAC 8-1-6 since there are no rules in article 8 that applies to casket surface coating and it has potential VOC emissions of 44.85 tons/year, which is greater than 25 tons per year. However, the source requested a limit of less than 25 tons per year to avoid the requirements of 326 IAC 8-1-6. The limitation is as follows:

Volatile Organic Compounds (VOC) BACT Avoidance Limit [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the input VOC, including coatings, dilution solvents and cleaning solvents to the primer booth identified as EU-3, shall not exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions to less than 25 tons per twelve consecutive month period and render 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to the primer booth identified as EU-3.

- (b) The casket lid coat stripping is not subject to 326 IAC 8-1-6, because it has potential VOC emission of 4.59 tons per year which is well below 25 tons per year.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

This rule applies to all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (thirty-nine thousand (39,000) gallons) containing volatile organic compounds whose true vapor pressure is greater than 10.5 kPa (1.52 psi), constructed on or after January 1, 1980.

The one (1) gasoline underground horizontal storage tank, identified as Tank 002 UST, constructed in 1990 is not subject to this rule because its capacity is less than 39,000 gallons.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The gasoline dispensing facility associated with the gasoline storage tank, identified as Tank 002 UST is subject to the requirements of 326 IAC 8-4-6.

326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)

The degreasing operation, identified as PC1, 2, 3 is subject to the requirements of 326 IAC 8-3-2. This rule applies to cold cleaner type degreasing facilities constructed after July 1, 1990 and located anywhere in the state.

326 IAC 8-3-8 (Material requirements for cold cleaner degreasers)

The degreasing operation is subject to the provisions of 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers) because the source is a user of solvents for use in cold cleaning degreasers. The source shall meet the material requirements for cold cleaning degreasers specified in 326 IAC 8-3-8(c) and record keeping requirements specified in 326 IAC 8-3-8(d) of this rule.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The Compliance Determination Requirements applicable to this modification are as follows:

Primer Booth, EU-3:

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

Emission Units	Frequency	Parameters
Primer Booth, EU-3	Daily	Inspections shall be performed to verify placement, integrity and particle loading of the dry filters.
	Weekly	Observations of the overspray from the surface coating booth stacks, while one or more booths are in operation.
	Monthly	Observations of the coating emission from the stacks, and presence of overspray on rooftops and nearby ground.

This monitoring requirement is necessary to ensure compliance with 326 IAC 6.5.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No; T029-32454-00001 Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

- (a) Section A.1 has been modified to include the source's SIC code description.
- (b) Section A.2 has been updated to include the new emission units and proposed changes in this permitting action.
- (c) IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination, NESHAP Requirements and added rule cites in condition titles in Section E.1
- (d) The Part 70 Operating Permit terms and conditions have been updated and clarified to reflect the updated version of the rules and reflect the source major PSD status and typographical errors have been corrected throughout the permit.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary metal and wooden burial casket manufacturing operation.

Source Address:	10944 Marsh Road, Aurora, Indiana 47001
General Source Phone Number:	812-926-5718
SIC Code:	3995 (Burial Caskets)
County Location:	Dearborn (Washington Township)
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) scratch primer/sealer booth, identified as EU-1, with a maximum capacity of 40 burial caskets per hour, ~~using a waterwash curtain for overspray control, constructed in 1969, and exhausting to stack 1A.~~ **waterwash curtain replaced in 2012 with dry filters for overspray control and exhausting to stack 1A.**
- (b) ~~One (1) primer booth identified as EU-3, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969,~~

~~exhausting through stacks 3A and 3B.~~

One (1) primer booth identified as EU-3, constructed in 2012 and permitted in 2016, with a maximum throughput rate of 40 burial caskets per hour, using dry filters for overspray control, exhausting through stack S3-C.

- (c) One (1) color booth, identified as EU-4, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 4A and 4B.
- (d) One (1) shade booth, identified as EU-5, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 5A and 5B.
- (e) One (1) topcoat booth, identified as EU-6, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stack 6A.
- (f) One (1) touchup booth, identified as EU-7, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stack 7A.
- (g) One (1) inspection/repair booth, identified as EU-8, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stacks 8A and 8B.
- (h) One (1) metal surface coating line (line 2) consisting of one (1) surface coating spray booth, identified as ~~Hardware Color Booth~~ **MRA/Inspection**, constructed in 1969, with a maximum capacity of 100 handles and fixtures per hour, using dry filters to control particulate matter (PM) emissions, and exhausting through one (1) stack (8A).

Under 40 CFR 63, Subpart M, the surface coating spray booths, identified as EU-1 through EU-8, and the Hardware Color Booth are considered affected facilities.

- (i) One (1) diesel fuel storage tank, installed in August 1990, with a maximum capacity of 20,000 gallons.
- (j) **One (1) casket lid coat stripping operation, constructed in 1993, and permitted in 2016, with a maximum throughput rate of 12 units per hour, with no control.**
- (k) **One (1) pillow cotton filling operation, approved in 2016 for construction, with a maximum usage rate of 1,662.5 pounds per day, exhausting to the roof, with no control.**

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities ~~which are specifically regulated~~, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, with rod or wire usage of less than 625 pounds per day.
- (b) Paved and unpaved roads and parking lots with public access.
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000

actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; and pneumatic conveying.

- (d) Other activities or categories not previously identified:
 - (1) ~~Glue Beeths-table~~
 - (2) Rope sealer
 - (3) A six (6) stage washer
 - (4) Miscellaneous machining
- (e) Natural gas-fired combustion sources with a combined maximum heat input capacity equal to or less than ten million (10,000,000) Btu per hour.
- (f) **One (1) degreasing operation, identified as PC1, 2, 3 constructed in 2007, and permitted in 2016, with a maximum throughput rate of 130 gallons/year, with no control.**
- (g) **One (1) acetone underground horizontal storage tank, identified as Tank 001 UST, with a capacity of 6,000 gallons, constructed in 1990.**
- (h) **One (1) gasoline underground horizontal storage tank, identified as Tank 002 UST with a capacity of 6,000 gallons, constructed in 1990 and gasoline dispensing unit associated with the gasoline Tank 002 UST.**
- (i) **One (1) acetone vertical storage tank, identified as AST Thinner Tank, with a capacity of 3,000 gallons, constructed in 1970.**
- (j) **One (1) electric infrared low temperature oven, identified as EU-11.**

SECTION B

GENERAL CONDITIONS

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T029-32454-00001 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this **combined** permit, all previous registrations and permits are superseded by this **Part-combined new source review and part 70** operating permit.

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(4042). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(~~3637~~)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

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

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)]~~[326 IAC 2-7-5(7)]~~~~[326 IAC 2-7-19(c)]~~[326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 ~~(32(33))~~ ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require ~~the~~a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official" as defined by 326 IAC 2-7-1~~(3435)~~.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
~~[326 IAC 2-2]~~**[326 IAC 2-3]**

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) scratch primer/sealer booth, identified as EU-1, with a maximum capacity of 40 burial caskets per hour, ~~using a waterwash curtain for overspray control, constructed in 1969, and exhausting to stack 1A.~~ **waterwash curtain replaced in 2012 with dry filters for overspray control and exhausting to stack 1A.**
- ~~(b) One (1) primer booth identified as EU-3, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 3A and 3B.~~
- (c) One (1) color booth, identified as EU-4, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 4A and ~~4B~~.
- (d) One (1) shade booth, identified as EU-5, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 5A and 5B.
- (e) One (1) topcoat booth, identified as EU-6, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stack 6A.
- (f) One (1) touchup booth, identified as EU-7, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stack 7A.
- (g) One (1) inspection/repair booth, identified as EU-8, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stacks 8A and 8B.
- (h) One (1) metal surface coating line ~~(line 2) consisting of one (1) surface coating spray booth, identified as Hardware Color Booth~~ **MRA/Inspection**, constructed in 1969, ~~with a maximum capacity of 100 handles and fixtures per hour, using dry filters to control particulate matter (PM) emissions, and exhausting through one (1) stack (8A).~~

Under 40 CFR 63, Subpart M, the surface coating spray booths, identified as EU-1 through EU-8, and the ~~Hardware Color Booth~~ are considered affected facilities.

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

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.~~ **A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.**

Compliance Determination Requirements [326 IAC 2-7-5(1)]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.4 Dry Filter Monitoring [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be

made of the overspray from the surface coating booth stacks 1A, 1B, ~~3A, 3B~~, 4A through 4D, 5A, 5B, 6A, 7A, 8A, and 8B, while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.5 Water Wash Monitoring [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks 1A, 2A and 2B, ~~3A and 3B~~, 4A through 4D, 5A and 5B, and 6A (associated with EU-1, EU-2, ~~EU-3~~, EU-4, EU-5 and EU-6, respectively) and surface coating booth stacks 1A and 1B, 2A and 2B, ~~3A and 3B~~, and 4A and 4B (associated with surface coating line -1) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- (a) To document **the** compliance **status** with Conditions D.1.4 and D.1.5, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) primer booth identified as EU-3, constructed in 2012 and permitted in 2016, with a maximum throughput rate of 40 burial caskets per hour, using dry filters for overspray control, exhausting through stack S3-C.

[Under 40 CFR 63, Subpart M, the surface coating spray booth, identified as EU-3 is considered affected facilities].

- (j) One (1) casket lid coat stripping operation, constructed in 1993, and permitted in 2016, with a maximum throughput rate of 12 units per hour, with no control.
- (k) One (1) pillow cotton filling operation, approved in 2016 for construction, with a maximum usage rate of 1,662.5 pounds per day, exhausting to the roof, with no control.

Insignificant activities:

- (f) One (1) degreasing operation, identified as PC1, 2, 3 constructed in 2007, and permitted in 2016, with a maximum throughput rate of 130 gallons/year, with no control.
- (g) One (1) acetone underground horizontal storage tank, identified as Tank 001 UST, with a capacity of 6,000 gallons, constructed in 1990.
- (h) One (1) gasoline underground horizontal storage tank, identified as Tank 002 UST with a capacity of 6,000 gallons, constructed in 1990 and gasoline dispensing unit associated with the gasoline Tank 002 UST.

(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 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) Minor Limit [326 IAC 2-2] [326 IAC 8-1-6]

The input VOC, including coatings, dilution solvents and cleaning solvents to the primer booth, identified as EU-3 shall not exceed 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit combined with the potential to emit VOC from other emission units in this 2016 source modification shall limit the VOC emissions to less than 40 tons per twelve consecutive month period and satisfies the requirements of 326 IAC 2-2 (PSD) and also render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to primer booth, identified as EU-3.

D.3.2 Particulate Matter (PM) Limitations Except Lake County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the pillow filling operation shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.3.3 Particulate Matter (PM) Limitations Except Lake County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(h) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the primer booth, identified as EU-3 shall be controlled dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (1) The source shall operate the control device in accordance with manufacturer's specifications.

D.3.4 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

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

- (B) shall be applied at a pressure that does not cause excessive splashing.

D.3.5 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-4-6]

Pursuant to 326 IAC 8-4-6 (Gasoline Dispensing Facilities):

- (a) The gasoline dispensing facility associated with the gasoline storage tank, identified as Tank 002 UST is subject to the following requirements:
- (1) No owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless the tank is equipped with the following:
- (A) A submerged fill pipe that extends to not more than:
- (i) twelve (12) inches from the bottom of the storage tank if the fill pipe was installed on or before November 9, 2006; or
 - (ii) six (6) inches from the bottom of the storage tank if the fill pipe was installed after November 9, 2006.
- (B) Either a pressure relief valve set to release at not less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.
- (C) A vapor balance system connected between the tank and the transport operating according to manufacturer's specifications.
- (2) If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is:
- (A) connected between the transport and the storage tank; and
 - (B) operating according to manufacturer's specifications.

D.3.7 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.3.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.9 Particulate Control [326 IAC 2-7-6(6)]

In order to ensure compliance with Condition D.3.2, the dry filters for particulate control shall be in place and in operation and control emissions from the primer booth, identified as EU-3 at all times that this booth is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.3.10 Monitoring [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the primer booth, EU-3 stack while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response.
- (c) Section C – Response to Excursions or Exceedances contains the Permittee's obligations with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.11 Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- (a) To document the compliance status with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limit established in Condition 3.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC usage for each month.
 - (5) The total VOC usage for each compliance period.
- (b) To document the compliance status with Condition D.3.5, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.

- (4) **The total volume of the solvent purchased.**
- (5) **The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).**
- (c) **To document the compliance status with Condition D.3.10, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.**
- (d) **Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.**

D.3.12 Reporting Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-19]

A quarterly summary of the information to document the compliance status with Condition D.3.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS-NESHAP

Emissions Unit Description:

- (a) One (1) scratch primer/sealer booth, identified as EU-1, with a maximum capacity of 40 burial caskets per hour, ~~using a waterwash curtain for overspray control, constructed in 1969, and exhausting to stack 1A.~~ **waterwash curtain replaced in 2012 with dry filters for overspray control and exhausting to stack 1A.**
- (b) **One (1) primer booth identified as EU-3, constructed in 2012 and permitted in 2016, with a maximum throughput rate of 40 burial caskets per hour, using dry filters for overspray control, exhausting through stack S3-C.**
- (c) One (1) color booth, identified as EU-4, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 4A and 4B.
- (d) One (1) shade booth, identified as EU-5, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stacks 5A and 5B.
- (e) One (1) topcoat booth, identified as EU-6, with a maximum capacity of 40 burial caskets per hour, using a waterwash curtain for overspray control, constructed in 1969, exhausting through stack 6A.
- (f) One (1) touchup booth, identified as EU-7, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stack 7A.
- (g) One (1) inspection/repair booth, identified as EU-8, with a maximum capacity of 40 burial caskets per hour, using dry filters for overspray control, constructed in 1969, exhausting through stacks 8A and 8B.
- (h) One (1) metal surface coating line ~~(line 2) consisting of one (1) surface coating spray booth, identified as Hardware Color Booth~~ **MRA/Inspection**, constructed in 1969, with a maximum

~~capacity of 100 handles and fixtures per hour, using dry filters to control particulate matter (PM) emissions, and exhausting through one (1) stack (8A).~~

Under 40 CFR 63, Subpart Mmmm, the surface coating spray booths, identified as EU-1 through EU-8, and the Hardware Color Booth are considered affected facilities.

(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 2-7-5(1)]~~ **National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]**

E.1.1 ~~General Provisions Relating to NESHAP Subpart Mmmm (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) [326 IAC 20-1] [40 CFR Part 63, Subpart A]~~ **General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

(a) Pursuant to ~~40 CFR 63.3904,~~ **63.1** the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as ~~326 IAC 20-1-4 as specified in Table 2 of 40 CFR Part 63, Subpart Mmmm in accordance with schedule in 40 CFR 63 Subpart Mmmm.~~ **for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart Mmmm.**

(b) Pursuant to **40 CFR 63.10**, the Permittee shall submit all required notifications and reports to:

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

E.1.2 ~~Hazardous Pollutants– Miscellaneous Metal Parts and Products Surface Coating~~ **NESHAP [40 CFR 63, Subpart Mmmm]** [326 IAC 20-80] and ~~NESHAP Subpart Mmmm Requirements [40 CFR 63, Subpart Mmmm]~~

Pursuant to ~~326 IAC 20-80 and 40 CFR 63, Subpart Mmmm~~, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart Mmmm (included as Attachment A of this permit), for the entire source, beginning January 2, 2007, as follows:

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart Mmm (included as Attachment A to this operating permit), which are incorporated by referenced as 326 IAC 20-80 for the emission units listed above:

- ~~(a) 40 CFR 63.3880~~
- ~~(b) 40 CFR 63.3881(a)(1), (a)(2) and (b)~~
- ~~(c) 40 CFR 63.3882~~
- ~~(d) 40 CFR 63.3883(b) and (d)~~
- ~~(e) 40 CFR 63.3890(b)(1)~~
- ~~(f) 40 CFR 63.3891(b)~~
- ~~(g) 40 CFR 63.3892(a)~~
- ~~(h) 40 CFR 63.3893(a)~~
- ~~(i) 40 CFR 63.3900(a)(1), (b)~~
- ~~(j) 40 CFR 63.3901~~
- ~~(k) 40 CFR 63.3910~~
- ~~(l) 40 CFR 63.3920~~
- ~~(m) 40 CFR 63.3930~~
- ~~(n) 40 CFR 63.3931~~
- ~~(o) 40 CFR 63.3950~~

- ~~(p) 40 CFR 63.3951~~
- ~~(q) 40 CFR 63.3952~~
- ~~(r) 40 CFR 63.3980~~
- ~~(s) 40 CFR 63.3981~~
- ~~(t) Tables 2, 3, and 4 of 40 CFR 63, Subpart M~~

- (1) 40 CFR 63.3880**
- (2) 40 CFR 63.3881(a)(1), (a)(2) and (b)**
- (3) 40 CFR 63.3882**
- (4) 40 CFR 63.3883(b) and (d)**
- (5) 40 CFR 63.3890(b)(1)**
- (6) 40 CFR 63.3891(b)**
- (7) 40 CFR 63.3892(a)**
- (8) 40 CFR 63.3893(a)**
- (9) 40 CFR 63.3900(a)(1), (b)**
- (10) 40 CFR 63.3901**
- (11) 40 CFR 63.3910**
- (12) 40 CFR 63.3920**
- (13) 40 CFR 63.3930**
- (14) 40 CFR 63.3931**
- (15) 40 CFR 63.3950**
- (16) 40 CFR 63.3951**
- (17) 40 CFR 63.3952**
- (18) 40 CFR 63.3980**
- (19) 40 CFR 63.3981**
- (20) Table 2 to Subpart M of Part 63—Applicability of General Provisions to Subpart M of Part 63**
- (21) Table 3 to Subpart M of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends,**
- (22) Table 4 to Subpart M of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups ^a**

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

Part 70 Quarterly Report

Source Name: Mathews Aurora, LLC
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Part 70 Permit No.: T029-32454-00001
Facilities: Primer Booth, identified as EU-3
Parameter: VOC Emissions
Limit: Shall not exceed 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER: _____ **YEAR:** _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 029-36767-00001 and Significant Permit Modification 029-36898-00001. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Aida DeGuzman at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4972 or toll free at 1-800-451-6027 extension 3-4972.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Summary of Source wide Potential to Emit**

Company Name: Matthews Aurora, LLC
 Address City IN Zip: 10944 Marsh Road, Aurora
 SSM No.: 029-36767-00001
 SPM No.: 029-36898-00001
 Reviewer: Aida DeGuzman

Process	Uncontrolled Potential to Emit (tons/year)										
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHG, as CO ₂ e	Total HAPs	Worst HAP	
¹ Surface Coating (constructed 1969)	149.72	149.72	149.72	0.00	0.00	724.57	0.00	0.00	4.37E+02	2.27E+02	(Xylene)
¹ Natural Gas Combustion (constructed 1969)	0.08	0.33	0.33	0.03	4.29	0.24	3.61	5184.30	8.10E-02	7.73E-02	(Hexane)
Insignificant - 3 Storage Tanks	0.00	0.00	0.00	0.00	0.00	0.38	0.00	0.00	0.00E+00	0.00E+00	
² 2012 Modification - EU-03	11.50	11.50	11.50	0.00	0.00	44.85	0.00	0.00	0.00E+00	0.00E+00	
² Degreasing Operation - PC-1, 2, 3 (Modification 2012)	0.00	0.00	0.00	0.00	0.00	0.53	0.00	0.00	0.00E+00	0.00E+00	
Proposed new Pillow Filling	3.95	3.95	3.95	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00	
Casket Lid Coat Stripping	0.00	0.00	0.00	0.00	0.00	4.59	0.00	0.00	0.00E+00		
Sourcewide Uncontrolled PTE	165.25	165.49	165.49	0.03	4.29	775.16	3.61	5184.30	436.76	227.19	(Xylene)

¹PM10 and PM2.5 for units constructed prior to the promulgation of these pollutants are accounted for Part 70 applicability purposes, since the basis of Part 70 is regulating all units emitting any of the regulated pollutants at major level. PM10 was promulgated on 7/31/1987 and PM2.5 was promulgated on 5/8/2008.

²The 2012 modification is being permitted in this 2016 modification since it was constructed and operated prior to receiving proper approval. The new pillow filling will also be included in this source modification. See tab "source mod".

Likewise, the sourcewide PTE is being re-calculated in this 2016 modification since the source's PTE was based on 30 units/hour instead of 40 units/hour.

Process	Limited Potential to Emit (tons/year)										
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHG, as CO ₂ e	Total HAPs	Worst HAP	
³ Surface Coating (constructed 1969)	3.07	3.07	3.07	0.00	0.00	724.57	0.00	0.00	4.37E+02	2.27E+02	(Xylene)
³ Natural Gas Combustion (constructed 1969)	0.08	0.33	0.33	0.03	4.29	0.24	3.61	5184.30	8.10E-02	7.73E-02	(Hexane)
Insignificant - 3 Storage Tanks	0.00	0.00	0.00	0.00	0.00	0.38	0.00	0.00	0.00E+00	0.00E+00	
² 2012 Modification - EU-03	0.08	0.08	0.08	0.00	0.00	34.08	0.00	0.00	0.00E+00	0.00E+00	
² Degreasing Operation- PC-1, 2, 3 (Modification 2012)	0.00	0.00	0.00	0.00	0.00	0.53	0.00	0.00	0.00E+00	0.00E+00	
Proposed new Pillow Filling	3.95	3.95	3.95	0.00	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00	
Casket Lid Coat Stripping	0.00	0.00	0.00	0.00	0.00	4.59	0.00	0.00	1.79E+00	1.79E+00	(Toluene)
Sourcewide Limited PTE	7.18	7.43	7.43	0.03	4.29	764.40	3.61	5184.30	438.55	227.19	(Xylene)

³ For PSD applicability these units were constructed in 1969. Therefore they are grandfathered for PSD rules (8/7/1977). In addition PM10 and PM2.5 were not regulated pollutants at the time these units were constructed.

Note: This entire App A - is a re-calculation of the source wide PTE based on 40 units/hour. Previous permits PTE calculations were inadvertently calculated based on 30 units/hour.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Mathews Aurora, LLC
Address City IN Zip: 10944 Marsh Road, Aurora, Indiana 47001
SSM No.: 029-36767-00001
SPM No.: 029-36898-00001
Reviewer: Aida DeGuzman

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Control Efficiency	Controlled Particulate (ton/year)		
Scratch Booth (EU-1)																				
High Build Scratch Sealer	7.17	92.00%	14.0%	78.0%	0.0%	20.00%	0.04170	40	5.59	5.59	9.33	223.88	40.86	1.05	27.96	75%	98%	0.02		
Primer Booth #1 (EU-2)																				
Gray Water Reduceable	10.00	22.29%	0.0%	22.3%	0.0%	75.00%	0.01670	40	2.23	2.23	1.49	35.74	6.52	5.68	2.97	75%	98%	0.11		
Primer Booth #2 (EU-3)																				
*Primer	7.96	60.93%	0.0%	60.9%	0.0%	39.07%	0.05280	40	4.85	4.85	10.24	245.75	44.85	11.50	12.41	60%	99%	0.08		
Color Booth (EU-4)																				
White Color Coat	10.17	51.67%	0.0%	51.7%	0.0%	20.00%	0.26700	40	5.25	5.25	56.12	1346.92	245.81	57.48	26.27	75%	98%	1.15		
Black Color Coat	7.09	84.98%	0.0%	85.0%	0.0%	20.00%	0.26700	40	6.03	6.03	64.35	1544.35	281.84	12.45	30.13	75%	98%	0.25		
Dk. Copper Color Coat	7.09	81.21%	0.0%	81.2%	0.0%	20.00%	0.26700	40	5.76	5.76	61.49	1475.84	269.34	15.58	28.79	75%	98%	0.31		
Silver Color Coat	7.09	83.24%	0.0%	83.2%	0.0%	20.00%	0.26700	40	5.90	5.90	63.03	1512.73	276.07	13.90	29.51	75%	98%	0.28		
Diamond Blue Color Coat	7.09	83.88%	0.0%	83.9%	0.0%	20.00%	0.26700	40	5.95	5.95	63.51	1524.36	278.20	13.37	29.74	75%	98%	0.27		
Coral FB Color Coat	10.01	52.27%	0.0%	52.3%	0.0%	20.00%	0.26700	40	5.23	5.23	55.88	1341.12	244.76	55.87	26.16	75%	98%	1.12		
Pink FB Color Coat	10.17	51.54%	0.0%	51.5%	0.0%	20.00%	0.26700	40	5.24	5.24	55.98	1343.53	245.19	57.64	26.21	75%	98%	1.15		
Storm Blue Color Coat	7.09	83.38%	0.0%	83.4%	0.0%	20.00%	0.26700	40	5.91	5.91	63.14	1515.27	276.54	13.78	29.56	75%	98%	0.28		
Cedarstone	7.09	83.19%	0.0%	83.2%	0.0%	20.00%	0.26700	40	5.90	5.90	62.99	1511.82	275.91	13.94	29.49	75%	98%	0.28		
Hyacinth FB	7.34	80.44%	0.0%	80.4%	0.0%	20.00%	0.26700	40	5.90	5.90	63.06	1513.39	276.19	16.79	29.52	75%	98%	0.34		
Leaf Rust FB	7.09	82.83%	0.0%	82.8%	0.0%	20.00%	0.26700	40	5.87	5.87	62.72	1505.28	274.71	14.24	29.36	75%	98%	0.28		
Turquoise FB	7.17	82.75%	0.0%	82.8%	0.0%	20.00%	0.26700	40	5.93	5.93	63.37	1520.79	277.54	14.46	29.67	75%	98%	0.29		
Lt. Copper FB	7.17	79.95%	0.0%	80.0%	0.0%	20.00%	0.26700	40	5.73	5.73	61.22	1469.33	268.15	16.81	28.66	75%	98%	0.34		
Gunmetal FB	7.09	82.73%	0.0%	82.7%	0.0%	20.00%	0.26700	40	5.87	5.87	62.64	1503.46	274.38	14.32	29.33	75%	98%	0.29		
Orchid FB	7.09	83.61%	0.0%	83.6%	0.0%	20.00%	0.26700	40	5.93	5.93	63.31	1519.45	277.30	13.59	29.64	75%	98%	0.27		
Cordova FB	7.17	79.90%	0.0%	79.9%	0.0%	20.00%	0.26700	40	5.73	5.73	61.18	1468.41	267.99	16.85	28.64	75%	98%	0.34		
Green Blend FB	7.17	82.55%	0.0%	82.6%	0.0%	20.00%	0.26700	40	5.92	5.92	63.21	1517.12	276.87	14.63	29.59	75%	98%	0.29		
Hunter Green HHR	7.09	89.29%	0.0%	89.3%	0.0%	20.00%	0.26700	40	6.33	6.33	67.61	1622.68	296.14	8.88	31.65	75%	98%	0.18		
Shade Booth																				
WR Silver	8.34	37.88%	32.0%	5.9%	35.0%	25.00%	0.10800	40	0.75	0.49	2.12	50.84	9.28	49.01	1.96	50%	98%	0.98		
WR Diamond Blue	8.34	37.16%	32.0%	5.2%	35.0%	25.00%	0.10800	40	0.66	0.43	1.86	44.62	8.14	49.58	1.72	50%	98%	0.99		
WR Goldtone	8.42	36.16%	32.0%	4.2%	35.0%	25.00%	0.10800	40	0.54	0.35	1.51	36.32	6.63	50.85	1.40	50%	98%	1.02		
Gold Shade	7.75	66.10%	32.0%	34.1%	35.0%	33.80%	0.10800	40	4.07	2.64	11.42	274.00	50.01	50.86	7.82	50%	98%	0.50		
Hawthorne Met.	7.65	68.50%	32.0%	36.5%	35.0%	31.40%	0.10800	40	4.30	2.79	12.06	289.50	52.83	22.80	8.89	50%	98%	0.46		
Arapaho Copper	7.68	68.00%	32.0%	36.0%	35.0%	31.90%	0.10800	40	4.25	2.76	11.94	286.65	52.31	23.25	8.67	50%	98%	0.47		
Blue Ink	7.98	62.80%	32.0%	30.8%	35.0%	37.10%	0.10800	40	3.78	2.46	10.62	254.83	46.51	28.08	6.62	50%	98%	0.56		
Dk. Bronze Met.	7.68	66.30%	32.0%	34.3%	35.0%	33.60%	0.10800	40	4.05	2.63	11.38	273.12	49.84	24.49	7.84	50%	98%	0.49		
Red Velour Dye	7.17	93.33%	32.0%	61.3%	35.0%	25.00%	0.10800	40	6.77	4.40	19.00	455.92	83.21	4.52	17.59	50%	98%	0.09		
Topaz Dye	7.17	93.33%	32.0%	61.3%	35.0%	25.00%	0.10800	40	6.77	4.40	19.00	455.92	83.21	4.52	17.59	50%	98%	0.09		
Blue Dye	7.17	93.30%	32.0%	61.3%	35.0%	25.00%	0.10800	40	6.76	4.40	18.99	455.70	83.16	4.54	17.58	50%	98%	0.09		
Topcoat Booth (EU-6)																				
Topcoat DH-32-17	7.34	80.68%	0.0%	80.7%	0.0%	20.00%	0.25000	40	5.92	5.92	59.22	1421.26	259.38	15.53	29.61	75%	98%	0.31		
Touch-up Booth (EU7)																				
White Color Coat	10.17	51.67%	0.0%	51.7%	0.0%	20.00%	0.01700	40	5.25	5.25	3.57	85.76	15.65	7.32	26.27	50%	98%	0.15		
Black Color Coat	7.09	84.98%	0.0%	85.0%	0.0%	20.00%	0.01700	40	6.03	6.03	4.10	98.33	17.95	1.59	30.13	50%	98%	0.03		
Dk. Copper Color Coat	7.09	81.21%	0.0%	81.2%	0.0%	20.00%	0.01700	40	5.76	5.76	3.92	93.97	17.15	1.98	28.79	50%	98%	0.04		
Silver Color Coat	7.09	83.24%	0.0%	83.2%	0.0%	20.00%	0.01700	40	5.90	5.90	4.01	96.32	17.58	1.77	29.51	50%	98%	0.04		
Diamond Blue Color Coat	7.09	83.88%	0.0%	83.9%	0.0%	20.00%	0.01700	40	5.95	5.95	4.04	97.06	17.71	1.70	29.74	50%	98%	0.03		
Coral FB Color Coat	10.01	52.27%	0.0%	52.3%	0.0%	20.00%	0.01700	40	5.23	5.23	3.56	85.39	15.58	7.12	26.16	50%	98%	0.14		
Pink FB Color Coat	10.17	51.54%	0.0%	51.5%	0.0%	20.00%	0.01700	40	5.24	5.24	3.56	85.54	15.61	7.34	26.21	50%	98%	0.15		
Storm Blue Color Coat	7.09	83.38%	0.0%	83.4%	0.0%	20.00%	0.01700	40	5.91	5.91	4.02	96.48	17.61	1.75	29.56	50%	98%	0.04		
Cedarstone	7.09	83.19%	0.0%	83.2%	0.0%	20.00%	0.01700	40	5.90	5.90	4.01	96.26	17.57	1.77	29.49	50%	98%	0.04		
Hyacinth FB	7.34	80.44%	0.0%	80.4%	0.0%	20.00%	0.01700	40	5.90	5.90	4.01	96.36	17.59	2.14	29.52	50%	98%	0.04		
Leaf Rust FB	7.09	82.83%	0.0%	82.8%	0.0%	20.00%	0.01700	40	5.87	5.87	3.99	95.84	17.49	1.81	29.36	50%	98%	0.04		
Turquoise FB	7.17	82.75%	0.0%	82.8%	0.0%	20.00%	0.01700	40	5.93	5.93	4.03	96.83	17.67	1.84	29.67	50%	98%	0.04		
Lt. Copper FB	7.17	79.95%	0.0%	80.0%	0.0%	20.00%	0.01700	40	5.73	5.73	3.90	93.55	17.07	2.14	28.66	50%	98%	0.04		
Gunmetal FB	7.09	82.73%	0.0%	82.7%	0.0%	20.00%	0.01700	40	5.87	5.87	3.99	95.73	17.47	1.82	29.33	50%	98%	0.04		
Orchid FB	7.09	83.61%	0.0%	83.6%	0.0%	20.00%	0.01700	40	5.93	5.93	4.03	96.74	17.66	1.73	29.64	50%	98%	0.03		
Cordova FB	7.17	79.90%	0.0%	79.9%	0.0%	20.00%	0.01700	40	5.73	5.73	3.90	93.49	17.06	2.15	28.64	50%	98%	0.04		
Green Blend FB	7.17	82.55%	0.0%	82.6%	0.0%	20.00%	0.01700	40	5.92	5.92	4.02	96.60	17.63	1.86	29.59	50%	98%	0.04		
Hunter Green HHR	7.09	89.29%	0.0%	89.3%	0.0%	20.00%	0.01700	40	6.33	6.33	4.30	103.32	18.86	1.13	31.65	50%	98%	0.02		
Repair Booth (EU-8)																				
Reflow Repair	7.67	85.86%	0.0%	85.9%	0.0%	14.00%	0.01700	40	6.59	6.59	4.48	107.47	19.61	1.62	47.04	50%	98%	0.03		
175.67												4,216.01		769.42		161.22		3.07		

* Modification done on Jan 1, 2012 - EU-3 existing spray booth was totally replaced by a new spray booth with automated HVLP robotic system controlled by two-part dry filtration panel system.

All Booths were constructed in 1969 which are grandfathered from PSD Review. During this time PM was the only regulated pollutant.

PM10 was promulgated in 1987 and PM2.5 was promulgated in 2008.

METHODOLOGY

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

Controlled Particulate (tons/year) = Particulate Potential (tons/year) x (1-control efficiency)

2012 Modification Limit (EU-3)(tons/yr)			
Unlimited VOC	**Uncontrolled PM2.5	Limited VOC	Controlled PM2.5
44.85	11.50	34.08	0.08

** PM is assumed to equal PM10 and PM2.5

No HAP is emitted by this modification.</

Appendix A: Emission Calculations
HAP Emission Calculations for Surface Coating Operations

Company Name: Matthews Aurora, LLC
 Address City IN Zip: 10944 Marsh Road, Aurora, Indiana 47001
 SSM No. 029-36767-00001
 SPM No. 029-36898-00001
 Reviewer: Aida DeGuzman

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Triethylamine	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Triethylamine Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
Scratch Booth											
High Build Scratch Sealer	7.17	0.0417	40.0	0.00%	44.00%	0.00%	3.00%	0.00	23.05	0.00	1.57
Primer Booth #1											
Gray Water Reduceable	10.00	0.0167	40.0	0.00%	0.00%	0.00%	6.00%	0.00	0.00	0.00	1.76
Primer Booth #2											
Gray Water Reduceable	10.00	0.1500	40.0	0.00%	0.00%	0.00%	6.00%	0.00	0.00	0.00	15.77
Color Booth											
White Color Coat	10.17	0.2670	40.0	7.00%	18.00%	0.00%	0.00%	33.30	85.63	0.00	0.00
Black Color Coat	7.09	0.2670	40.0	16.00%	3.00%	0.00%	0.00%	53.07	9.95	0.00	0.00
Dk. Copper Color Coat	7.09	0.2670	40.0	15.00%	0.00%	0.00%	0.00%	49.75	0.00	0.00	0.00
Silver Color Coat	7.09	0.2670	40.0	15.00%	0.00%	0.00%	0.00%	49.75	0.00	0.00	0.00
Diamond Blue Color Coat	7.09	0.2670	40.0	16.00%	0.00%	0.00%	0.00%	53.07	0.00	0.00	0.00
Coral FB Color Coat	10.01	0.2670	40.0	7.00%	18.00%	0.00%	0.00%	32.78	84.29	0.00	0.00
Pink FB Color Coat	10.17	0.2670	40.0	7.00%	18.00%	0.00%	0.00%	33.30	85.63	0.00	0.00
Storm Blue Color Coat	7.09	0.2670	40.0	16.00%	0.00%	0.00%	0.00%	53.07	0.00	0.00	0.00
Cedartone	7.09	0.2670	40.0	16.00%	0.00%	0.00%	0.00%	53.07	0.00	0.00	0.00
Hyacinth FB	7.34	0.2670	40.0	15.00%	0.00%	0.00%	0.00%	51.50	0.00	0.00	0.00
Leaf Rust FB	7.09	0.2670	40.0	16.00%	0.00%	0.00%	0.00%	53.07	0.00	0.00	0.00
Turquoise FB	7.17	0.2670	40.0	15.00%	0.00%	0.00%	0.00%	50.31	0.00	0.00	0.00
Lt. Copper FB	7.17	0.2670	40.0	14.00%	0.00%	0.00%	0.00%	46.96	0.00	0.00	0.00
Gunmetal FB	7.09	0.2370	40.0	16.00%	0.00%	0.00%	0.00%	47.10	0.00	0.00	0.00
Orchid FB	7.09	0.2670	40.0	16.00%	0.00%	0.00%	0.00%	53.07	0.00	0.00	0.00
Cordova FB	7.17	0.2670	40.0	15.00%	0.00%	0.00%	0.00%	50.31	0.00	0.00	0.00
Green Blend FB	7.17	0.2670	40.0	16.00%	0.00%	0.00%	0.00%	53.66	0.00	0.00	0.00
Hunter Green HHR	7.09	0.2670	40.0	8.00%	23.00%	0.00%	0.00%	26.53	76.28	0.00	0.00
Shade Booth											
WR Silver	8.34	0.1080	40.0	0.00%	0.00%	1.00%	7.00%	0.00	0.00	1.58	11.05
WR Diamond Blue	8.34	0.1080	40.0	0.00%	0.00%	0.00%	7.00%	0.00	0.00	0.00	11.05
WR Goldtone	8.42	0.1080	40.0	0.00%	0.00%	0.00%	7.00%	0.00	0.00	0.00	11.15
Gold Shade	7.75	0.1080	40.0	25.00%	6.00%	0.00%	0.00%	36.66	8.80	0.00	0.00
Hawthorne Met.	7.65	0.1080	40.0	18.00%	0.00%	0.00%	0.00%	26.06	0.00	0.00	0.00
Arapaho Copper	7.68	0.1080	40.0	29.00%	0.00%	0.00%	0.00%	42.14	0.00	0.00	0.00
Blue Ink	7.98	0.1080	40.0	35.00%	0.00%	0.00%	0.00%	52.85	0.00	0.00	0.00
Dk. Bronze Met.	7.68	0.1080	40.0	20.00%	0.00%	0.00%	0.00%	29.06	0.00	0.00	0.00
Red Velour Dye	7.17	0.1080	40.0	44.00%	13.00%	0.00%	3.00%	59.69	17.64	0.00	4.07
Topaz Dye	7.17	0.1080	40.0	44.00%	13.00%	0.00%	3.00%	59.69	17.64	0.00	4.07
Blue Dye	7.17	0.1080	40.0	44.00%	13.00%	0.00%	3.00%	59.69	17.64	0.00	4.07
Topcoat Booth											
Topcoat DH-32-17	7.34	0.2500	40.0	32.00%	12.00%	0.00%	0.00%	102.88	38.58	0.00	0.00
Touch-up Booth											
White Color Coat	10.17	0.0170	40.0	7.00%	18.00%	0.00%	0.00%	2.12	5.45	0.00	0.00
Black Color Coat	7.09	0.0170	40.0	16.00%	3.00%	0.00%	0.00%	3.38	0.63	0.00	0.00
Dk. Copper Color Coat	7.09	0.0170	40.0	15.00%	0.00%	0.00%	0.00%	3.17	0.00	0.00	0.00
Silver Color Coat	7.09	0.0170	40.0	15.00%	0.00%	0.00%	0.00%	3.17	0.00	0.00	0.00
Diamond Blue Color Coat	7.09	0.0170	40.0	16.00%	0.00%	0.00%	0.00%	3.38	0.00	0.00	0.00
Coral FB Color Coat	10.01	0.0170	40.0	7.00%	18.00%	0.00%	0.00%	2.09	5.37	0.00	0.00
Pink FB Color Coat	10.17	0.0170	40.0	7.00%	18.00%	0.00%	0.00%	2.12	5.45	0.00	0.00
Storm Blue Color Coat	7.09	0.0170	40.0	16.00%	0.00%	0.00%	0.00%	3.38	0.00	0.00	0.00
Cedartone	7.09	0.0170	40.0	16.00%	0.00%	0.00%	0.00%	3.38	0.00	0.00	0.00
Hyacinth FB	7.34	0.0170	40.0	15.00%	0.00%	0.00%	0.00%	3.28	0.00	0.00	0.00
Leaf Rust FB	7.09	0.0170	40.0	16.00%	0.00%	0.00%	0.00%	3.38	0.00	0.00	0.00
Turquoise FB	7.17	0.0170	40.0	15.00%	0.00%	0.00%	0.00%	3.20	0.00	0.00	0.00
Lt. Copper FB	7.17	0.0170	40.0	14.00%	0.00%	0.00%	0.00%	2.99	0.00	0.00	0.00
Gunmetal FB	7.09	0.0170	40.0	16.00%	0.00%	0.00%	0.00%	3.38	0.00	0.00	0.00
Orchid FB	7.09	0.0170	40.0	16.00%	0.00%	0.00%	0.00%	3.38	0.00	0.00	0.00
Cordova FB	7.17	0.0170	40.0	15.00%	0.00%	0.00%	0.00%	3.20	0.00	0.00	0.00
Green Blend FB	7.17	0.0170	40.0	16.00%	0.00%	0.00%	0.00%	3.42	0.00	0.00	0.00
Hunter Green HHR	7.09	0.0170	40.0	8.00%	23.00%	0.00%	0.00%	1.69	4.86	0.00	0.00
Repair Booth											
Reflow Repair	7.67	0.0170	40.0	33.00%	15.00%	0.00%	17.00%	7.54	3.43	0.00	3.88

TOTAL
436.68

Potential Emissions

227.19 173.78 1.58 34.13

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

PTE of Source Modification

Company Name: Matthews Aurora, LLC
 Address City IN Zip: 10944 Marsh Road, Aurora, Indiana 47001
 SSM No.: 029-36767-00001
 SPM No.: 029-36898-00001
 Reviewer: Aida DeGuzman

UNCONTROLLED PTE SUMMARY OF SOURCE MODIFICATION						
Operation/Unit	PM tons/yr	PM10 tons/yr	PM2.5 ton/yr	VOC tons/yr	Total HAPs tons/yr	Single HAP tons/yr
Degreasing Operation, PC1-3	0.00	0.00	0.00	0.53	0.00	0.00
Casket Lid Coat Stripping	0.00	0.00	0.00	4.59	1.79	1.79
Pillow Filling	3.95	3.95	3.95	0.00	0.00	0.00
2 Storage Tanks - 1990	0.00	0.00	0.00	0.29	0.00	0.00
Surface Coating EU-3	11.50	11.50	11.50	44.85	0.00	0.00
Total PTE	15.45	15.45	15.45	50.27	1.79	1.79

toluene

LIMITED PTE SUMMARY OF SOURCE MODIFICATION						
Operation/Unit	PM tons/yr	PM10 tons/yr	PM2.5 ton/yr	VOC tons/yr	Total HAPs tons/yr	Single HAP tons/yr
Degreasing Operation PC1-3	0.00	0.00	0.00	0.53	0.00	0.00
Casket Lid Coat Stripping	0.00	0.00	0.00	4.59	1.79	1.79
Pillow Filling	3.95	3.95	3.95	0.00	0.00	0.00
2 Storage Tanks - 1990	0.00	0.00	0.00	0.29	0.00	0.00
*Surface Coating EU-3	0.08	0.08	0.08	24.50	0.00	0.00
Total PTE	4.03	4.03	4.03	29.92	1.79	1.79

Note: The total replacement of paint booth EU-3 did not affect the

existing upstream and downstream processes.

* limited to 24.5 tons per year to avoid both 326IAC 2-2 and 326 IAC 8-1-6

Insignificant Degreasing Operation- PC 1, 2, 3						
Material	Maximum Throughput (gal/yr)	Density (lb/gal)	Wt % VOC	Wt % HAP	VOC Emissions (tons/yr)	HAP Emissions (tons/yr)
Mineral Spirit	130.05	8.2	100%	0%	0.53	0

Methodology:

PTE, tons/yr = Max. throughput, gal/yr x density, lb/gal x % VOC wt x ton/2000 lbs

Casket Lid Coat Stripping							
Material	Maximum Throughput (units/hr)	Gal/Unit	Density (lb/gal)	Wt % VOC	Wt % HAP (Toluene)	VOC Emissions (tons/yr)	HAP (Toluene) Emissions (tons/yr)
Solvent Blend	12	0.05	6.81	26%	10%	4.59	1.79

The lid washing is used to dissolved the coatings on casket lids with defective coating finished.

Methodology:

PTE, tons/yr = Max. throughput, unit/hr x gal/unit x density, lb/gal x % VOC wt or % HAP wt x 8760 x ton/2000 lbs

Pillow Filling Operation			
Amount of Cotton Utilized /Day			
Maximum Throughput (bale/day)	Weight of Cotton (lbs/bale)		Total Maximum Cotton Weight Used/Day (lbs/day)
3.5	475		1662.5
No. of Pillows Filled/Day			
Maximum Throughput (pillows/day)	Weight of Pillow (lbs/pillow)		Total Cotton Weight In the Pillows (lbs/day)
424	3.87		1640.88
Weight of Cotton Loss (lbs/day)			21.62
PM Uncontrolled PTE (tons/year)			3.95

*Summary of Surface Coating EU-3 PTE			
Unlimited VOC	**Uncontrolled PM2.5	Limited VOC	Controlled PM2.5
44.85	11.50	34.08	0.08

*Modification of EU-3 was made in 2012. This modification is being permitted to satisfy the permitting requirements.

** PM is assumed to equal PM10 and PM2.5

No HAP is emitted by this EU-3 modification.

* PM is assumed equal PM10 and PM2.5 and operation does not have a control device.

Methodology: Using Mass Balance

PTE, tons/yr, loss cotton = Total Maximum Wt. Cotton Used, lbs/day - Weight of pillow, lbs/pillow

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

Company Name: Matthews Aurora, LLC
 Address City IN Zip: 10944 Marsh Road, Aurora, Indiana 47001
 SSM No. 029-36767-00001
 SPM No. 029-36898-00001
 Reviewer: Aida DeGuzman

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
10.0	1020	85.9

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.08	0.33	0.33	0.03	4.29	0.24	3.61

*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
 Emission units are miscellaneous natural gas-fired combustion units with a combined heat input capacity of less than 10 MMBtu/hr.

Methodology

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

HAPS Calculations

HAPs - Organics						
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total - Organics
Potential Emission in tons/yr	9.018E-05	5.153E-05	3.221E-03	7.729E-02	1.460E-04	8.080E-02

HAPs - Metals							
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals	
Potential Emission in tons/yr	2.147E-05	4.724E-05	6.012E-05	1.632E-05	9.018E-05	2.353E-04	
	Total HAPs					8.104E-02	
	Worst HAP					7.729E-02	(Hexane)

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.

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	5,153	0.1	0.1
Summed Potential Emissions in tons/yr	5,153		
CO2e Total in tons/yr	5,184		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Identification and Physical Characteristics

Identification

User Identification: 001 StorageTank
 City: Aurora
 State: Indiana
 Company: Mathews Aurora, LLC
 Type of Tank: Underground Horizontal Tank
 Description:

Tank Dimensions

Shell Length (ft): 17.50
 Diameter (ft): 7.70
 Volume (gallons): 6,000.00
 Turnovers: 24.12
 Net Throughput(gal/yr): 144,720.00
 Is Tank Heated (y/n): N
 Is Tank Underground (y/n): Y

Paint Characteristics

Shell Color/Shade:
 Shell Condition

Breather Vent Settings

Vacuum Settings (psig): -0.03
 Pressure Settings (psig): 0.03

Meteorological Data used in Emissions Calculations: Columbus, Ohio (Avg Atmospheric Pressure = 14.33 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

001 StorageTank - Horizontal Tank
Aurora, Indiana

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Acetone	All	50.84	50.84	50.84	50.40	2.3011	2.3011	2.3011	58.0800			58.08	Option 2: A=7.117, B=1210.595, C=229.664

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

001 StorageTank - Horizontal Tank
Aurora, Indiana

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
Acetone	460.51	0.00	460.51

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Identification and Physical Characteristics

Identification

User Identification: 002 gasoline UST
 City: Aurora
 State: Indiana
 Company: Matthews Aurora, LLC
 Type of Tank: Underground Horizontal Tank
 Description:

Tank Dimensions

Shell Length (ft): 17.50
 Diameter (ft): 7.70
 Volume (gallons): 6,000.00
 Turnovers: 2.00
 Net Throughput(gal/yr): 12,000.00
 Is Tank Heated (y/n): N
 Is Tank Underground (y/n): Y

Paint Characteristics

Shell Color/Shade:
 Shell Condition

Breather Vent Settings

Vacuum Settings (psig): -0.03
 Pressure Settings (psig): 0.03

Meteorological Data used in Emissions Calculations: Columbus, Ohio (Avg Atmospheric Pressure = 14.33 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

002 gasoline UST - Horizontal Tank
Aurora, Indiana

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Calculation
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Gasoline (RVP 15.0)	All	50.84	50.84	50.84	50.40	6.8706	6.8706	6.8706	60.0000			92.00	Option 4: R

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

002 gasoline UST - Horizontal Tank
Aurora, Indiana

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
Gasoline (RVP 15.0)	117.78	0.00	117.78

TANKS 4.0.9d
Emissions Report - Summary Format
Tank Identification and Physical Characteristics

Identification

User Identification: AST 001- Thinner Tank
 City: Aurora
 State: Indiana
 Company: Matthews Aurora, LLC
 Type of Tank: Vertical Fixed Roof Tank
 Description:

Tank Dimensions

Shell Height (ft): 11.00
 Diameter (ft): 7.00
 Liquid Height (ft) : 9.50
 Avg. Liquid Height (ft): 5.00
 Volume (gallons): 3,000.00
 Turnovers: 6.20
 Net Throughput(gal/yr): 17,000.00
 Is Tank Heated (y/n): N

Paint Characteristics

Shell Color/Shade: White/White
 Shell Condition: Good
 Roof Color/Shade: White/White
 Roof Condition: Good

Roof Characteristics

Type: Dome
 Height (ft): 0.00
 Radius (ft) (Dome Roof): 0.00

Breather Vent Settings

Vacuum Settings (psig): -0.03
 Pressure Settings (psig): 0.03

Meteorological Data used in Emissions Calculations: Columbus, Ohio (Avg Atmospheric Pressure = 14.33 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

AST Thinner Tank - Vertical Fixed Roof Tank
Aurora, Indiana

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for V. Calculation
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Acetone	All	53.04	48.06	58.01	51.42	2.4404	2.1349	2.7812	58.0800			58.08	Option 2: A

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

AST Thinner Tank - Vertical Fixed Roof Tank
Aurora, Indiana

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions

Acetone	57.37	112.41	169.78
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Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

May 26, 2016
Matthews Aurora, LLC
029-36767-00001 & 029-36898-00001

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

May 26, 2016

Mr. Larry Mabry
Matthews Aurora, LLC
10944 Marsh Road
Aurora, IN 47001

Re: Public Notice
Matthews Aurora, LLC
Permit Level: Significant Source Modification &
Significant Permit Modification
Permit Number: 029-36767-00001 &
029-36898-00001

Dear Mr. Mabry:

Enclosed is a copy of your draft Significant Source Modification, Significant Permit Modification, 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 Journal Press in Lawrenceburg, Indiana publish the abbreviated version of the public notice no later than May 31, 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 Aurora Public Library, 414 Second Street in Aurora, 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 Aida DeGuzman, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-4972 or dial (317) 233-4972.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

May 26, 2016

To: Aurora 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: Matthews Aurora, LLC
Permit Number: 029-36767-00001 & 029-36898-00001

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 2/16/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 26, 2016

Journal Press
126 West High Street
PO Box 4128
Lawrenceburg, IN 47025

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Matthews Aurora, LLC, Dearborn 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 May 31, 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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Significant Source Modification & Significant Permit Modification
Permit Number: 029-36767-00001 & 029-36898-00001

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 5/26/2016 Matthews Aurora, LLC 029-36767/36989-00001 Draft		Type of Mail: CERTIFICATE OF MAILING ONLY	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		Larry Mabry Matthews Aurora, LLC 10944 Marsh Rd Aurora IN 47001 (Source CAATS)										
2		Mark Leisen Plant Manager Matthews Aurora, LLC 10944 Marsh Rd Aurora IN 5735 (RO CAATS)										
3		Michael & Monica Ramsey 9931 Old SR 56 Aurora IN 47001 (Affected Party)										
4		Aurora Public Library 414 Second St Aurora IN 47001-1384 (Library)										
5		Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 (Local Official)										
6		Dearborn County Health Department 215-b W. Hight St, County Admin Building Lawrenceburg IN 47025-1910 (Health Department)										
7		Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 (Affected Party)										
8		Robin & Vic Willoughby 311 Broadway Street Aurora IN 47001 (Affected Party)										
9		Aurora City Council and Mayors Office P.O. Box 158 Aurora IN 47001 (Local Official)										
10		Ken & Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 (Affected Party)										
11		Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 (Affected Party)										
12		Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party)										
13		Ms. Patricia Huff 10095 Old SR 56 Aurora IN 47001 (Affected Party)										
14		Sam & Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)										
15		Mrs. Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)										

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