



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

To: Interested Parties

Date: August 17, 2016

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

Source Name: Rhinehart Finishing, LLC

Permit Level: Minor Source Operating Permit Renewal

Permit Number: 033-37156-00078

Source Location: 5345 County Road 68, Spencerville, Indiana

Type of Action Taken: Permit Renewal

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 37156.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Rhinehart Finishing, LLC
5345 County Road 68
Spencerville, Indiana 46788**

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M033-37156-00078	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 17, 2016 Expiration Date: August 17, 2026

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary custom coating and finishing plant.

Source Address:	5345 County Road 68, Spencerville, Indiana 46788
General Source Phone Number:	260-238-4452
SIC Code:	3479 (Coating, Engraving, etc. Not Elsewhere Classified)
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Surface coating operations consisting of the following:
- (1) One (1) spray paint booth, identified as PB-1, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-19.
 - (2) One (1) spray paint booth, identified as PB-2, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-20.
 - (3) One (1) spray paint booth, identified as PB-3, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-21.
 - (4) One (1) spray paint booth, identified as PB-4, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-22.
 - (5) One paint booth, identified as PB-5, constructed in 2005, equipped with two (2) high volume low pressure (HVLP) paint guns, and only 1 spray gun operates at a time, with a maximum throughput rate of 425 square feet of parts per hour, and exhausting to stack S-005.

- (6) One paint booth, identified as PB-6, constructed in 2005, equipped with two (2) high volume low pressure (HVLP) paint guns, only 1 spray gun operates at a time, and with a maximum throughput rate of 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters and exhausting to stack S-006.
 - (7) One (1) paint mix room, identified as PMR-1, constructed in 2001, with a maximum throughput of 23 gallons of paint per day, no control and with emissions exhausted through stack S-27.
 - (8) One (1) paint mix room, identified as PMR-2, constructed in 2005, with a maximum throughput of 23 gallons of paint per day, no control and exhausting through stack S-33.
 - (9) One (1) spray paint booth, identified as PB-7, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-34.
 - (10) One (1) spray paint booth, identified as PB-8, equipped with four (4) high volume low pressure (HVLP) spray guns used and only 1 spray gun operates at a time, for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-35.
 - (11) One (1) spray paint booth, identified as PB-9, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-36.
 - (12) One (1) spray paint booth, identified as PB-10, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-37.
 - (13) One (1) paint mix room, identified as PMR-3, constructed in 2006, with a maximum throughput of 23 gallons of paint per day, no control and exhausting through stack S-38.
- (b) One (1) powder coating booth, identified as PC-1, constructed in 2001, using an electrostatic air atomized application method, with a maximum capacity of 75 metal parts per hour and using a cyclone and baghouse, which are considered integral to the process and exhausting indoors.
- (c) One (1) six-stage metal parts aqueous washing and zinc phosphating line, constructed in 2001, using only water, soap and zinc phosphate solutions, and consisting of the following natural gas-fired heating units:
- (1) Washer-line drying oven (identified as C.U. 001) having a maximum heat input capacity of 2.5 MMBtu per hour and exhausting at stack S-8.
 - (2) Washer-line stage 1 burner (identified as C.U. 002) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-3.

- (3) Washer-line stage 4 burner (identified as C.U. 003) having a maximum heat input capacity of 2.0 MMBtu per hour and exhausting at stack S-4.

The other three (3) stages of the aqueous washing and zinc phosphating line are not heated.

- (d) Natural gas-fired combustion units with heat input equal to or less than ten (10) MMBtu per hour, including:

Emission Unit/ I.D	Maximum Heat Input Capacity (MMBtu/hr)	Year Constructed
Powder Coat Cure Oven (C.U. 004)	3.5	2001
Liquid Spray Paint Cure Oven (C.U. 005)	1.5	2001
North General Building Heater (C.U. 006)	0.3	2001
Southeast General Building Heater (C.U. 007)	0.3	2001
South General Building Heater (C.U. 008)	0.3	2001
Wet Paint Room Air Makeup Unit (C.U. 009)	1.1	2001
Powder Paint Room Air Makeup Unit (C.U. 010)	1.1	2001
Warehouse Area Air Makeup Unit (C.U. 011)	2.073	2001
Environmental Room Air condition and heater No.1 (C.U. 012)	0.15	2001
Environmental Room Air condition and heater No.2 (C.U. 013)	0.15	2001
Natural Gas-fired Building Heater (C.U. 014)	2.50	2006
Natural Gas-fired Building Heater (C.U. 015)	2.50	2006
Natural Gas-fired Building Heater (C.U. 016)	2.50	2006
Natural Gas-fired Building Heater (C.U. 017)	2.50	2006
Natural Gas-fired Building Heater (C.U. 018)	2.50	2006
Natural Gas-fired Building Heater (C.U. 019)	2.50	2006
Natural Gas-fired Building Heater (C.U. 020)	2.50	2006
Natural Gas-Fired Cure Oven (C.U. 021)	2.50	2006

- (e) Paved Roads

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M033-37156-00078, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The 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.

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

- (a) All terms and conditions of permits established prior to M033-37156-00078 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted.

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

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Surface coating operations consisting of the following:
- (1) One (1) spray paint booth, identified as PB-1, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-19.
 - (2) One (1) spray paint booth, identified as PB-2, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-20.
 - (3) One (1) spray paint booth, identified as PB-3, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-21.
 - (4) One (1) spray paint booth, identified as PB-4, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-22.
 - (5) One paint booth, identified as PB-5, constructed in 2005, equipped with two (2) high volume low pressure (HVLP) paint guns, and only 1 spray gun operates at a time, with a maximum throughput rate of 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters and exhausting to stack S-005.
 - (6) One paint booth, identified as PB-6, constructed in 2005, equipped with two (2) high volume low pressure (HVLP) paint guns, only 1 spray gun operates at a time, and with a maximum throughput rate of 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters and exhausting to stack S-006.
 - (7) One (1) paint mix room, identified as PMR-1, constructed in 2001, with a maximum throughput of 23 gallons of paint per day, no control and with emissions exhausted through stack S-27.
 - (8) One (1) paint mix room, identified as PMR-2, constructed in 2005, with a maximum throughput of 23 gallons of paint per day, no control and exhausting through stack S-33.
 - (9) One (1) spray paint booth, identified as PB-7, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-34.
 - (10) One (1) spray paint booth, identified as PB-8, equipped with four (4) high volume low pressure (HVLP) spray guns used and only 1 spray gun operates at a time, for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-35.

- (11) One (1) spray paint booth, identified as PB-9, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-36.
- (12) One (1) spray paint booth, identified as PB-10, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-37.
- (13) One (1) paint mix room, identified as PMR-3, constructed in 2006, with a maximum throughput of 23 gallons of paint per day, no control and exhausting through stack S-38.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, when coating metal parts in the spray paint booths PB-1 through PB-10, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, less water, as delivered to the applicator at each spray paint booth for extreme performance coatings.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the spray paint booths (PB-1 through PB-10) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that no overspray is visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.1.1 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.

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available no later than 30 days after the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (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 monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.
- (b) To document the compliance status with Condition D.1.3, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNITS OPERATION CONDITIONS

Facility Description

- (b) One (1) powder coating booth, identified as PC-1, constructed in 2001, using an electrostatic air atomized application method, with a maximum capacity of 75 metal parts per hour and using a cyclone and baghouse, which are considered integral to the process and exhausting indoors.
- (c) One (1) six-stage metal parts aqueous washing and zinc phosphating line, constructed in 2001, using only water, soap and zinc phosphate solutions, and consisting of the following natural gas-fired heating units:
 - (1) Washer-line drying oven (identified as C.U. 001) having a maximum heat input capacity of 2.5 MMBtu per hour and exhausting at stack S-8.
 - (2) Washer-line stage 1 burner (identified as C.U. 002) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-3.
 - (3) Washer-line stage 4 burner (identified as C.U. 003) having a maximum heat input capacity of 2.0 MMBtu per hour and exhausting at stack S-4.

The other three (3) stages of the aqueous washing and zinc phosphating line are not heated.

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

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

D.2.1 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.2 Particulate Control

In order to assure that the requirements of 326 IAC 6-3-2 (Particulate Matter Emission Limitations for Manufacturing Processes) do not apply to the one (1) powder coating booth (PC-1), the cyclone and baghouse for particulate control shall be in operation and control emissions from the one (1) powder coating booth (PC-1) at all times that the one (1) powder coating booth (PC-1) is in operation.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Rhinehart Finishing, LLC
Address:	5345 County Road 68
City:	Spencerville, Indiana 46788
Phone #:	260-238-4452
MSOP #:	M033-37156-00078

I hereby certify that Rhinehart Finishing, LLC is:

still in operation.

no longer in operation.

I hereby certify that Rhinehart Finishing, LLC is:

in compliance with the requirements of MSOP M033-37156-00078.

not in compliance with the requirements of MSOP M033-37156-00078.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit Renewal

Source Background and Description
--

Source Name:	Rhinehart Finishing, LLC
Source Location:	5345 County Road 68, Spencerville, IN 46788
County:	DeKalb
SIC Code:	3479 (Coating, Engraving, etc. Not Elsewhere Classified)
Permit Renewal No.:	M033-37156-00078
Permit Reviewer:	Nicholas Eilerman

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Rhinehart Finishing, LLC relating to the operation of a stationary custom coating and finishing plant. On May 4, 2016, Rhinehart Finishing, LLC submitted an application to the OAQ requesting to renew its operating permit. Rhinehart Finishing, LLC was issued its MSOP Renewal M033-22778-00078 on September 7, 2006.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Surface coating operations consisting of the following:
- (1) One (1) spray paint booth, identified as PB-1, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-19.
 - (2) One (1) spray paint booth, identified as PB-2, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-20.
 - (3) One (1) spray paint booth, identified as PB-3, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-21.
 - (4) One (1) spray paint booth, identified as PB-4, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2001. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-22.
 - (5) One paint booth, identified as PB-5, constructed in 2005, equipped with two (2) high volume low pressure (HVLP) paint guns, and only 1 spray gun operates at a

- time, with a maximum throughput rate of 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters and exhausting to stack S-005.
- (6) One paint booth, identified as PB-6, constructed in 2005, equipped with two (2) high volume low pressure (HVLP) paint guns, only 1 spray gun operates at a time, and with a maximum throughput rate of 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters and exhausting to stack S-006.
 - (7) One (1) paint mix room, identified as PMR-1, constructed in 2001, with a maximum throughput of 23 gallons of paint per day, no control and with emissions exhausted through stack S-27.
 - (8) One (1) paint mix room, identified as PMR-2, constructed in 2005, with a maximum throughput of 23 gallons of paint per day, no control and exhausting through stack S-33.
 - (9) One (1) spray paint booth, identified as PB-7, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-34.
 - (10) One (1) spray paint booth, identified as PB-8, equipped with four (4) high volume low pressure (HVLP) spray guns used and only 1 spray gun operates at a time, for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-35.
 - (11) One (1) spray paint booth, identified as PB-9, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-36.
 - (12) One (1) spray paint booth, identified as PB-10, equipped with four (4) high volume low pressure (HVLP) spray guns and only 1 spray gun operates at a time, used for painting steel, aluminum and plastic parts, constructed in 2006. The maximum capacity is 425 square feet of parts per hour, with particulate matter emissions controlled by dry filters, and exhausting at stack S-37.
 - (13) One (1) paint mix room, identified as PMR-3, constructed in 2006, with a maximum throughput of 23 gallons of paint per day, no control and exhausting through stack S-38.
- (b) One (1) powder coating booth, identified as PC-1, constructed in 2001, using an electrostatic air atomized application method, with a maximum capacity of 75 metal parts per hour and using a cyclone and baghouse, which are considered integral to the process and exhausting indoors.
 - (c) One (1) six-stage metal parts aqueous washing and zinc phosphating line, constructed in 2001, using only water, soap and zinc phosphate solutions, and consisting of the following natural gas-fired heating units:

- (1) Washer-line drying oven (identified as C.U. 001) having a maximum heat input capacity of 2.5 MMBtu per hour and exhausting at stack S-8.
- (2) Washer-line stage 1 burner (identified as C.U. 002) having a maximum heat input capacity of 3.5 MMBtu per hour and exhausting at stack S-3.
- (3) Washer-line stage 4 burner (identified as C.U. 003) having a maximum heat input capacity of 2.0 MMBtu per hour and exhausting at stack S-4.

The other three (3) stages of the aqueous washing and zinc phosphating line are not heated.

- (d) Natural gas-fired combustion units with heat input equal to or less than ten (10) MMBtu per hour, including:

Emission Unit/ I.D	Maximum Heat Input Capacity (MMBtu/hr)	Year Constructed
Powder Coat Cure Oven (C.U. 004)	3.5	2001
Liquid Spray Paint Cure Oven (C.U. 005)	1.5	2001
North General Building Heater (C.U. 006)	0.3	2001
Southeast General Building Heater (C.U. 007)	0.3	2001
South General Building Heater (C.U. 008)	0.3	2001
Wet Paint Room Air Makeup Unit (C.U. 009)	1.1	2001
Powder Paint Room Air Makeup Unit (C.U. 010)	1.1	2001
Warehouse Area Air Makeup Unit (C.U. 011)	2.073	2001
Environmental Room Air condition and heater No.1 (C.U. 012)	0.15	2001
Environmental Room Air condition and heater No.2 (C.U. 013)	0.15	2001
Natural Gas-fired Building Heater (C.U. 014)	2.50	2006
Natural Gas-fired Building Heater (C.U. 015)	2.50	2006
Natural Gas-fired Building Heater (C.U. 016)	2.50	2006
Natural Gas-fired Building Heater (C.U. 017)	2.50	2006
Natural Gas-fired Building Heater (C.U. 018)	2.50	2006
Natural Gas-fired Building Heater (C.U. 019)	2.50	2006
Natural Gas-fired Building Heater (C.U. 020)	2.50	2006
Natural Gas-Fired Cure Oven (C.U. 021)	2.50	2006

- (e) Paved Roads

Existing Approvals

Since the issuance of the MSOP 033-22778-00078 on September 7, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Notice-Only Change No. (033-25790-00078) issued on January 10, 2008.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Air Pollution Control Justification as an Integral Part of the Process

Pursuant to MSOP No.: 033-14280-00078, issued July 23, 2001, IDEM, OAQ has determined that one (1) cyclone and (1) baghouse used in conjunction with the one (1) powder coating process, are considered as an integral part of the process:

- (a) The powder coating booth system draws powder from the application equipment over the parts with excess powder collected in a powder recovery system that consists of a cyclone and baghouse. This system is designed to be operated with the cyclone and baghouse as an integral part of the process.
- (b) This powder coating system cannot be operated without the powder recovery system because the amount of powder lost during the process would make this coating method prohibitively expensive.

IDEM, OAQ is not reevaluating the justification at this time and agrees that the one (1) cyclone and one (1) baghouse will continue to be considered as an integral part of the powder coating process. Therefore, the permitting level and state rule applicability will be determined using the potential to emit after the air pollution control equipment. Operating conditions in the proposed permit will specify that this air pollution control equipment shall operate at all times when the powder coating process is in operation.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in DeKalb County.

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

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. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 DeKalb 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
DeKalb County has been classified as attainment or unclassifiable in Indiana for all other criteria air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	22.18
PM ₁₀	17.06
PM _{2.5}	16.72
SO ₂	0.10
NO _x	16.52
VOC	26.96
CO	13.88
Single HAP	5.99 Xylene
Total HAP	15.80

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.
- (c) 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.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63.111, Subpart HHHHHH (6H), are not included in the permit since the source uses coatings that do not contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (d) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X), because the source has a SIC code of 3479, which is not one of the nine source categories listed in the rule.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 1-5-2 (Emergency Reduction Plans)
The source is subject to 326 IAC 1-5-2.

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:
(1) The potential to emit of all PSD regulated pollutants are less than 250 tons per year,
(2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County

This source is not subject to 326 IAC 6.8 because it is not located in Lake county.

State Rule Applicability – Individual Facilities

Surface Coating Operations

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

The ten (10) spray paint booths are subject to the provisions of 326 IAC 6-3-2 (particulate Emissions Limitations for Manufacturing Process), because each of the spray paint booths were originally permitted to have potential coating usage of equal to or greater than five (5) gallons per day and were previously determined to be subject to this rule as part of MSOP No. 033-14280-00078 issued July 23, 2001. According to 326 IAC 6-3-2(d)(4), a manufacturing process that is subject to this subsection shall remain subject to it notwithstanding any subsequent decrease in gallons of coating used.

- (a) Particulate from the spray paint booths (identified as PB-1 through PB-10) shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with the manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

The ten (10) spray paint booths are not subject to the requirements of 326 IAC 8-1-6 when coating steel and aluminum parts because they are already subject to 326 IAC 8-2-9.

The ten (10) spray paint booths are not subject to the requirements of 326 IAC 8-1-6 when coating plastic because each booth does not emit over 25 tons of VOC per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are applicable to the spray paint booths PB-1 through PB-10 coating steel and aluminum parts, because they were constructed after July 1, 1990, were originally permitted to have potential VOC emissions greater than fifteen (15) pounds per day, and were previously determined to be subject to this rule as part of MSOP No. 033-14280-00078 issued July 23, 2001. According to 326 IAC 8-1-1(a), once a facility becomes a subject to a rule within this article under any rule applicability section in this article, such facility shall remain subject to such rule notwithstanding any subsequent decrease in VOC emissions unless the provisions of subsections 326 IAC 8-1-1(b) through (d) are met.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), for spray paint booths (PB-1 through PB-10), the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenth (3.5) pounds of VOC per gallon of coating less water, as delivered to the applicator of each paint booth, for extreme performance coatings.

Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Based on the MSDS submitted by the source and calculations made, the spray paint booths (PB-1 through PB-10) are in compliance with this rule.

Pursuant to 326 IAC 8-2-9(d), surface coating of plastic parts is applicable to sources located only in Lake or Porter Counties. Therefore, when coating plastic parts, the spray paint booths (PB-1 through PB-10) are not subject to 326 IAC 8-2-9.

Paint Mixing Operations

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

Although constructed after January 1, 1980, the provisions of 326 IAC 8-1-6 (new Facilities - General Reduction Requirements) are not applicable to the three (3) paint mix rooms because the potential VOC emissions from each of these rooms are less than twenty-five (25) tons per year.

Powder Coating Operations

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

The powder coating booth (identified as PC-1) is not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because according to 326 IAC 6-3-1(b)(14) manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of this rule.

The integral cyclone and the baghouse shall be in operation at all times the powder coating booth (PC-1) is in operation, in order to assure this rule is not applicable.

326 IAC 8 (Volatile Organic Compound Rules)

Since no volatile organic compounds are used or produced in the powder coating operation, the powder coating booth PC-1 is not subject to any Article 8 rules.

Aqueous Washing and Zinc Phosphating Line Operations

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The metal parts aqueous washing and zinc phosphating line use only water, soap and zinc phosphate solutions, and contain no organic solvents. Therefore, this line is not subject to the provisions of 326 IAC 8-3.

Combustion Units

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired combustion units consisting of one (1) drying oven, two (2) burners, three (3) cure ovens, twelve (12) building heaters, three (3) air make-up units, and two (2) air conditioners are not subject to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are no indirect heating units.

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

The natural gas-fired combustion units consisting of one (1) drying oven, two (2) burners, three (3) cure ovens, twelve (12) building heaters, three (3) air make-up units, and two (2) air conditioners are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because according to 326 IAC 6-3-1(b)(14) manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of this rule.

Compliance Determination and Monitoring Requirements

There are no testing included in this permit for this source. The powder coating booth (PC-1) has a potential to emit less than twenty-five (25) tons of particulate matter per year and does not require the control device to comply with any emission limitations or avoidance limits. Therefore, no compliance monitoring requirements are necessary for this booth.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 4, 2016.

Conclusion

The operation of this stationary custom coating and finishing plant shall be subject to the conditions of the attached MSOP Renewal No. 033-37156-00078.

IDEM Contact

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

**Appendix A: Emission Calculations
Summary**

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Potential to Emit (tons/year)										
Emission Units	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total Haps	Single	Haps
PB-1 through PB-4	6.69	6.69	6.69	0.00	0.00	10.9	0.00	6.87	2.66	Xylene
PB-5 and PB-6	1.67	1.67	1.67	-	-	2.73	-	1.72	0.67	Xylene
PB-7 through PB-10	6.69	6.69	6.69	-	-	10.9	-	6.87	2.66	Xylene
Paint Mix Rooms	-	-	-	-	-	1.50	-	0.02	0.01	Toluene
Powder Coat Booth**	0.08	0.08	0.08	-	-	-	-	-	-	-
* Combustion Units	0.31	1.26	1.26	0.10	16.52	0.91	13.88	0.31	0.30	Hexane
Paved Roads	6.73	0.67	0.33	-	-	-	-	-	-	-
TOTAL	22.18	17.06	16.72	0.10	16.52	26.96	13.88	15.80	5.99	Xylene

* Combustion Units = 1 Drying Oven, 2 Burners, 3 Cure Ovens, 12 Bldg Heaters, 3 Air Make-Up Units, 2 Air Conditioners

** PTE after control since control is integral.

**Appendix A: Emissions Calculations
VOC and Particulate Emissions
From Paint Booths (PB-1 through PB-4)**

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Units ID	Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Material (gal/unit)	Max. Throughput (units/hour)	Max. Throughput (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	* Transfer Efficiency
PB-1	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	1.5	3.34	3.34	0.21	5.11	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.0	3.27	3.27	0.41	9.84	1.80	1.06	75%
PB-2	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	1.5	3.34	3.34	0.21	5.11	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.0	3.27	3.27	0.41	9.84	1.80	1.06	75%
PB-3	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	1.5	3.34	3.34	0.21	5.11	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.0	3.27	3.27	0.41	9.84	1.80	1.06	75%
PB-4	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	1.5	3.34	3.34	0.21	5.11	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.0	3.27	3.27	0.41	9.84	1.80	1.06	75%
TOTAL														10.9	6.69		

* Coating is applied using one (1) HVLP spray gun per paint booth, and only one (1) primer and one (1) top coat is applied per paint booth at a given time.

METHODOLOGY

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

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

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour)

PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Max. Throughput (units/hour) * Gal of Material (gal/unit) * Density (lb/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

PM2.5 = PM10

**Appendix A: Emission Calculations
HAP Emission Calculations
From Paint Booths (PB-1 through PB-4)**

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethylbenzene
PB-1	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-2	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-3	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-4	Primer	12.1	0.00015	425	0.0%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	PTE Xylene (tons/year)	PTE Toluene (tons/year)	PTE Methyl Isobutyl Ketone (tons/year)	PTE Ethylbenzene (tons/year)			
PB-1	Primer	See Above			0.00	0.24	0.08	0.00			
	Top Coat				0.67	0.30	0.30	0.12			
PB-2	Primer				0.00	0.24	0.08	0.00			
	Top Coat				0.67	0.30	0.30	0.12			
PB-3	Primer				0.00	0.24	0.08	0.00			
	Top Coat				0.67	0.30	0.30	0.12			
PB-4	Primer				0.00	0.24	0.08	0.00			
	Top Coat				0.67	0.30	0.30	0.12			
TOTAL					2.66	2.18	1.53	0.50			

Highest Single HAP (Xylene) in tons per year = 2.66
Combination of HAPs in tons per year = 6.87

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC and Particulate Emissions
From Paint Booths (PB-5 and PB-6)**

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Units ID	Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Material (gal/unit)	Max. Throughput (units/hour)	Max. Throughput (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	** Transfer Efficiency
PB-5	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	1.5	3.34	3.34	0.21	5.11	0.93	0.61	75%
PB-6	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.0	3.27	3.27	0.41	9.84	1.80	1.06	75%
TOTAL															2.73	1.67	

* Coating is applied using one (1) HVLP spray gun per paint booth, and only one (1) primer and one (1) top coat is applied per paint booth at a given time.

** Transfer efficiency for coating flat surface (AP-40, pages 859-861).

METHODOLOGY

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

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

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour)

PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Max. Throughput (units/hour) * Gal of Material (gal/unit) * Density (lb/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

PM2.5 = PM10

**Appendix A: Emission Calculations
HAP Emission Calculations
From Paint Booths (PB-5 and PB-6)**

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethylbenzene
PB-5	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
PB-6	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	PTE Xylene (tons/year)	PTE Toluene (tons/year)	PTE Methyl Isobutyl Ketone (tons/year)	PTE Ethylbenzene (tons/year)
PB-5	Primer	See Above			0.00	0.24	0.08	0.00
PB-6	Top Coat	See Above			0.67	0.30	0.30	0.12
TOTAL					0.67	0.55	0.38	0.12

Highest Single HAP (Xylene) in tons per year = 0.67
Combination of HAPs in tons per year = 1.72

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC and Particulate Emissions
From Paint Booths (PB-7 through PB-10)**

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Units ID	Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Material (gal/unit)	Max. Throughput (units/hour)	Max. Throughput (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	** Transfer Efficiency
PB-7	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	1.5	3.34	3.34	0.21	5.11	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.0	3.27	3.27	0.41	9.84	1.80	1.06	75%
PB-8	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	1.5	3.34	3.34	0.21	5.11	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.0	3.27	3.27	0.41	9.84	1.80	1.06	75%
PB-9	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	1.5	3.34	3.34	0.21	5.11	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.0	3.27	3.27	0.41	9.84	1.80	1.06	75%
PB-10	Primer	12.1	27.7%	0.0%	27.7%	0.0%	52.0%	0.00015	425	1.5	3.34	3.34	0.21	5.11	0.93	0.61	75%
	Top Coat	11.0	29.7%	0.0%	29.7%	0.0%	54.0%	0.00030	425	3.0	3.27	3.27	0.41	9.84	1.80	1.06	75%
TOTAL															10.9	6.69	

* Coating is applied using one (1) HVLP spray gun per paint booth, and only one (1) primer and one (1) top coat is applied per paint booth at a given time.

** Transfer efficiency for coating flat surface (AP-40, pages 859-861).

METHODOLOGY

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

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

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour)

PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lb/gal) * Gal of Material (gal/unit) * Max. Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Max. Throughput (units/hour) * Gal of Material (gal/unit) * Density (lb/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

PM2.5 = PM10

**Appendix A: Emission Calculations
HAP Emission Calculations
From Paint Booths (PB-7 through PB-10)**

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethylbenzene
PB-7	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-8	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-9	Primer	12.1	0.00015	425	0.00%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%
PB-10	Primer	12.1	0.00015	425	0.0%	7.20%	2.40%	0.10%
	Top Coat	11.0	0.00030	425	11.0%	5.00%	5.00%	2.00%

Unit ID	Material	Density (lb/gal)	Gallon of Material (gal/unit)	Max. Throughput (units/hour)	PTE Xylene (tons/year)	PTE Toluene (tons/year)	PTE Methyl Isobutyl Ketone (tons/year)	PTE Ethylbenzene (tons/year)			
PB-7	Primer	See Above			0.00	0.24	0.08	0.00			
	Top Coat				0.67	0.30	0.30	0.12			
PB-8	Primer				0.00	0.24	0.08	0.00			
	Top Coat				0.67	0.30	0.30	0.12			
PB-9	Primer				0.00	0.24	0.08	0.00			
	Top Coat				0.67	0.30	0.30	0.12			
PB-10	Primer				0.00	0.24	0.08	0.00			
	Top Coat				0.67	0.30	0.30	0.12			
TOTAL					2.66	2.18	1.53	0.50			

Highest Single HAP (Xylene) in tons per year = 2.66
Combination of HAPs in tons per year = 6.87

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
Paint Mix Rooms

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Partial Vapor Pressure of Paint Components used at Rhinehart Finishing
Liquid Paint Coatings & Supplemental Paint Mix Room Data

HAPS Volatile Component	VP _s (psi)	VP _s (mmHg)	Diffusion (Dx) Coefficients (cm ² /sec)	Diffusion (Dx) Coefficients (ft ² /sec)	MW (lb/Mole)	New PMR % Component (Ave)	Existing PMR % Component (Ave)
Toluene	0.60808	31.44700	0.08287	0.00009	92	9.7	6.0
MIBK	0.16133	8.33300	0.07660	0.00008	100	12.7	0.0
MEK	1.93370	100.00000	0.06960	0.00007	72	4.0	6.0
Xylenes	6.72895	1.34579	0.33033	0.00036	106	3.7	1.9
Ethylbenzene	0.18665	9.65250	0.07560	0.00008	106	0.7	0.0
HMDI	0.01934	<1	0.01410	0.00002	>250	7.3	0.3
1,2,4-Trimethylbenzene	0.09535	4.93100	0.06510	0.00007	120	0.0	0.0

General Emission Calculation Factors

Pressure	1	atm
Temperature (T)	25	C
	77	F
	537	R
Paint Mix Room Exhaust	1930	cu.ft/min
Paint Mix Room SA	64	sq.ft
Velocity (U)	0.34	Miles/Hr
Paint Can Volume	5.00	gallons
Paint Can Diameter	12	Inches
Paint Can Surface Area (A)	0.785	sq.ft
Paint Usage, Total	46	gallons/day
Batch Events	5	Batch/Day/PMR
Annual Events (B)	1300	Batch/Year/PMR
Time of Events (H)	0.5	Hr/Batch/PMR
Universal Gas Constant (R)	10.73	psi-ft ³ /R-lb mole
Pouring Factor (Agitation)	2	Dimensionless

Gas Phase Mass Transfer Coefficient (K_g) for VOC compound x (VOC_x)

HAPS Volatile Component	Gas Phase Mass Transfer Coefficient (K _g) (ft/sec)
Toluene	0.000828
MIBK	0.000786
MEK	0.000737
Xylenes	0.002082
Ethylbenzene	0.000779
HMDI	0.000254
1,2,4-Trimethylbenzene	0.000705

Emission Model for Surface Evaporation - Paint Mix Rooms

Potential to Emit (PTE)

HAPS Volatile Component	Emission (lb/yr/PMR) E _x	Emission (ton/yr/PMR) E _x	Total Emission (lb/yr) E _x	Total Emission (ton/yr) E _x
Toluene	29.533787	1.477E-02	88.601362	4.430E-02
MIBK	8.081774	4.041E-03	24.245321	1.212E-02
Xylenes	946.654405	4.733E-01	2839.963215	1.420E+00
Ethylbenzene	9.824733	4.912E-03	29.474199	1.474E-02
HMDI	0.783636	3.918E-04	2.350907	1.175E-03
1,2,4-Trimethylbenzene	5.142745	2.571E-03	15.428234	7.714E-03

Summation

1.50

References:

Diffusion Coefficients Calculations, USEPA, www.epa.gov/athens/learn2model/part-two/onsite/estdiffusion
USEPA, Emission Inventory Improvement Program, Volume II, Chapter 8, 02/2005

Emission Model for Surface Evaporation

Potential to Emit (PTE) - Based on Known Average Component Percentage

HAPS Volatile Component	New PMR Emission (lb/yr/PMR) E _x	New PMR Emission (ton/yr/PMR) E _x	Existing PMR Emission (lb/yr/PMR) E _x	Existing PMR Emission (ton/yr/PMR) E _x
Toluene	2.864777	1.432E-03	3.544054	1.772E-03
MIBK	1.026385	5.132E-04	0.000000	0.000E+00
Xylene	35.026213	1.751E-02	35.972867	1.799E-02
Ethylbenzene	0.068773	3.439E-05	0.000000	0.000E+00
HMDI	0.057205	2.860E-05	0.004702	2.351E-06

Summation

0.02

References:

Diffusion Coefficients Calculations, USEPA, www.epa.gov/athens/learn2model/part-two/onsite/estdiffusion
USEPA, Emission Inventory Improvement Program, Volume II, Chapter 8, 02/2005

**Appendix A: Emission Calculations
Powder Coating (PC-1)**

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Process	Max. Usage Rate (gal/unit)	Max. Units (units/hour)	Coating Density (lb/gal)	Solids Content (%)	PTE of PM/PM10 before integral control (tons/year)	Transfer Efficiency (tons/year)**	Process Control Efficiency (%)	PTE of PM/PM10 after integral control (tons/year)
Powder Coat Booth*	0.00703	75	14.2	100%	8.20	75%	99%	0.08

* Pursuant to MSOP No.: 033-14280-00078, issued July 23, 2001, the powders are collected by the filter and recycled to the process.

** Transfer efficiency for coating flat surface using electrostatic air atomized (AP-40, pages 859-861).

METHODOLOGY

PTE of PM/PM10 (tons/year) after integral controls = Max. Usage Rate (gal/unit) * Max. Throughput (units/hour) * Coating Density (lb/gal) * Solids Content (%) * Process Control Efficiency (%)

PM2.5 = PM10

PTE after control since control is integral.

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

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Emission Unit/ I.D	Heat Input Capacity MMBtu/hr
Washer-line drying oven (identified as C.U. 001)	2.5
Washer-line stage 1 burner (identified as C.U. 002)	3.5
Washer-line stage 4 burner (identified as C.U. 003)	2.0
Powder Coat Cure Oven (C.U. 004)	3.5
Liquid Spray Paint Cure Oven (C.U. 005)	1.5
North General Building Heater (C.U. 006)	0.3
Southeast General Building Heater (C.U. 007)	0.3
South General Building Heater (C.U. 008)	0.3
Wet Paint Room Air Makeup Unit (C.U. 009)	1.1
Powder Paint Room Air Makeup Unit (C.U. 010)	1.1
Warehouse Area Air Makeup Unit (C.U. 011)	2.073
Environmental Room Air condition and heater No.1 (C.U. 012)	0.15
Environmental Room Air condition and heater No.2 (C.U. 013)	0.15
Natural Gas-fired Building Heater (C.U. 014)	2.5
Natural Gas-fired Building Heater (C.U. 015)	2.5
Natural Gas-fired Building Heater (C.U. 016)	2.5
Natural Gas-fired Building Heater (C.U. 017)	2.5
Natural Gas-fired Building Heater (C.U. 018)	2.5
Natural Gas-fired Building Heater (C.U. 019)	2.5
Natural Gas-fired Building Heater (C.U. 020)	2.5
Natural Gas-Fired Cure Oven (C.U. 021)	2.5
Total	38.473

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
38.473	1020	330.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.31	1.26	1.26	0.10	**see below	0.91	13.88

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.5E-04	2.0E-04	1.2E-02	0.30	5.6E-04	0.31

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	8.3E-05	1.8E-04	2.3E-04	6.3E-05	3.5E-04	9.1E-04

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.

Total HAPs	0.31
Worst HAP	0.30

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: Rhinehart Finishing, LLC.
Source Address: 5345 County Road 48, Spencerville, Indiana 46788
Permit Number: M033-37156-00078
Reviewer: Nicholas Eilerman

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	48.0	1.0	48.0	20.0	961.4	1200	0.227	10.9	3981.8
Vehicle (leaving plant) (one-way trip)	48.0	1.0	48.0	20.0	960.0	1200	0.227	10.9	3981.8
Totals			96.0		1921.4			21.8	7963.6

Average Vehicle Weight Per Trip = 20.0 tons/trip
 Average Miles Per Trip = 0.23 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	20.0	20.0	20.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	1.848	0.370	0.0907	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.690	0.338	0.0830	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	3.68	0.74	0.18	3.36	0.67	0.17
Vehicle (leaving plant) (one-way trip)	3.68	0.74	0.18	3.36	0.67	0.17
Totals	7.36	1.47	0.36	6.73	1.35	0.33

Methodology

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

Abbreviations

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



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Perry Jackson
Rhinehart Finishing, LLC
5345 CR 68
Spencerville, IN 46788

DATE: August 17, 2016

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Minor Source Operating Permit Renewal
033-37156-00078

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Don McDaniel - VP
Edward P. Guindon – Edglo Labs, inc.
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 2/17/2016



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Michael R. Pence
Governor

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Commissioner

August 17, 2016

TO: Eckhart Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Rhinehart Finishing, LLC
Permit Number: 033-37156-00078

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or 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.

Enclosures
Final Library.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 8/17/2016 Rhinehart Finishing, LLC 033-37156-00078 Final		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		Perry Jackson Rhinehart Finishing, LLC 5345 CR 68 Spencerville IN 46788-9719 (Source CAATS) via certified mail										
2		Don McDaniel VP Rhinehart Finishing, LLC 5345 CR 68 Spencerville IN 46788-9719 (RO CAATS)										
3		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
5		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
6		DeKalb County Health Department 220 E 7th St #110 Auburn IN 46706 (Health Department)										
7		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
8		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										
9		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										
10		Eckhart Public Library 603 South Jackson Street Auburn IN 46706 (Library)										
11		DeKalb County Building Department 301 S Union St Auburn IN 46706 (Local Official)										
12		Edward P. Guindon Edglo Labs, Inc. 3303 Blackfoot Ct Fort Wayne IN 46815 (Consultant)										
13												
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