

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW**

OFFICE OF AIR MANAGEMENT

**W. Kendall and Sons, Inc.
106 East 1st Street and 10270 West U.S. 30
Wanatah, Indiana 46390**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F091-5643-00112	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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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 Management (OAM) and presented in the permit application.

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

The Permittee owns and operates a stationary metal parts coating plant.

Responsible Official: Wayne Rice, Owner
Source Address: 106 East 1st Street and 10270 West U.S. 30, Wanatah, Indiana 46390
Mailing Address: P.O. Box 9, Wanatah, Indiana 46390
SIC Codes: 3471, 3479
County Location: LaPorte
County Status: Maintenance for Sulfur dioxide
Attainment for all other criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

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

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

Located at 106 East 1st Street, Wanatah:

- (1) One (1) surface coating booth, identified as Spray booth 106-#1, with a maximum capacity of one unit per hour, with overspray controlled by dry filters, and exhausting to stack #1.
- (2) One (1) surface coating booth, identified as Spray booth 106-#2, with a maximum capacity of one unit per hour, with overspray controlled by dry filters, and exhausting to stack #2.

Located at 10270 West Highway 30, Wanatah:

- (1) One (1) spray coating booth, identified as Spray booth 10270-#1, with a maximum capacity of one unit per hour, with overspray controlled by dry filters, and solvent recovered by distillation, and exhausting to vent #1.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. (2.5 MMBtu per hour Curing oven 106-#3, 0.8 MMBtu per hour Curing oven 10270-#2, and 0.5 MMBtu per hour Curing oven 10270-#3)
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (3) Combustion source flame safety purging on startup.
- (4) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less

than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (6) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (7) Paved and unpaved roads and parking lots with public access.
- (8) Emergency gasoline generators not exceeding 110 horsepower.
- (9) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (Grinding Shop and Abrasive blasting)

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

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

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:

- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:
- (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;
 - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

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

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to

this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms or the substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) Delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the

source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM 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 in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.

- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

(b) For each such change, the required written notification shall include the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

(c) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

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

B.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) will not apply.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2(Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

-
- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

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

-
- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), that apply to all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Stacks shall be constructed using good engineering practice (GEP) according to the following equation:

$$S = H + 1.5 (L) \quad \text{where: } S = \text{Stack height, (feet)}$$

H = Height of supporting or nearby structure
(whichever is largest), (feet)

L = Lesser dimension (height or width) of
the structure chosen for H, (feet)

- (c) Any changes in the applicable stacks require prior approval from IDEM, OAM.

**C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

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

C.9 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM, OAM.

The test protocol shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

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

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

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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) Written notification is to be 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
- (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 40 CFR 68 is an applicable requirement, and the Permittee shall:

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

C.15 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the

Preventive Maintenance Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 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, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM reserves the right to utilize enforcement activities to resolve the non-compliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

C.18 Monitoring Data Availability

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) When the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information 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 kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (c) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply

with the required practices pursuant to 40 CFR 82.156

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Located at 106 East 1st Street, Wanatah, Indiana:

- (1) One (1) surface coating booth, identified as Spray booth 106-#1, with a maximum capacity of one unit per hour, with overspray controlled by dry filters, and exhausting to stack #1.
- (2) One (1) surface coating booth, identified as Spray booth 106-#2, with a maximum capacity of one unit per hour, with overspray controlled by dry filters, and exhausting to stack #2.

Located at 10270 West Highway 30, Wanatah, Indiana:

- (1) One (1) spray coating booth, identified as Spray booth 10270-#1, with a maximum capacity of one unit per hour, with overspray controlled by dry filters, and solvent recovered by distillation, and exhausting to vent #1.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8] [40 CFR 52.21]

The combined input VOC to the three (3) surface coating booths (106-#1, 106-#2, and 10270-#1) shall be limited to 94.0 tons per 365 consecutive days. This limit will cause VOC emission to be 94.0 tons per 365 consecutive days. Therefore, the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) do not apply.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators of the three (3) surface coating booths, 106-#1, 106-#2, and 10270-#1, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

D.1.3 Emission Minimization [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.4 Particulate Matter (PM) Overspray [326 IAC 6-3-2(c)]

The PM overspray from the three (3) surface coating booths (106-#1, 106-#2, and 10270-#1) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and VOC usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the three (3) surface coating booths (106-#1, 106-#2, and 10270-#1) are in operation.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;

- (3) The volume weighted VOC content of the coatings used for each day that a coating greater than 3.5 pounds per gallon of VOC is used, by:

$$\underline{\text{lb VOC}} = 3 \underline{\text{coatings [Dc * O * Q / [1 - W * Dc / Dw]]}}$$

gallon less water 3C

Dc = density of coating, lb/gal
O = weight percent organics, %
W = percent volume water, %

Dw = density of water, lb/gal
Q = quantity of coating, gal/unit
C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Insignificant Activities:

- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (9) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (Grinding Shop and Abrasive blasting)

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Grinding Shop and from the Abrasive blasting operations shall not exceed allowable PM emission rate based on the following equation:

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

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

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4(1).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.3 Record Keeping and Reporting Requirements

There are no record keeping or reporting requirements for these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

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

Source Name: W. Kendall and Sons, Inc.
Source Address: 106 East 1st Street and 10270 West U.S. 30, Wanatah, Indiana 46390
Mailing Address: P.O. Box 9, Wanatah, Indiana 46390
FESOP No.: F091-5643-00112

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

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

Source Name: W. Kendall and Sons, Inc.
Source Address: 106 East 1st Street and 10270 West U.S. 30, Wanatah, Indiana 46390
Mailing Address: P.O. Box 9, Wanatah, Indiana 46390
FESOP No.: F091-5643-00112

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

FESOP Monthly Report

Source Name: W. Kendall and Sons, Inc.
 Source Address: 106 East 1st Street and 10270 West U.S. 30, Wanatah, Indiana 46390
 Mailing Address: P.O. Box 9, Wanatah, Indiana 46390
 FESOP No.: F091-5643-00112
 Facility: Surface Coating Booths, 106-#1, 106-#2, and 10270-#1
 Parameter: VOC emissions
 Limit: VOC: 94.0 tons per 365 day period

Month: _____

Year: _____

Day	average VOC content of coatings used (lb/gallon)	equivalent VOC emissions (tons)	VOC emissions for previous 364 days (tons)	365 day rolling total VOC emissions (tons/yr)	Day	average VOC content of coatings used (lb/gallon)	equivalent VOC emissions (tons)	VOC emissions for previous 364 days (tons)	365 day rolling total VOC emissions (tons/yr)
1					17				
2					18				
3					19				
4					20				
5					21				
6					22				
7					23				
8					24				
9					25				
10					26				
11					27				
12					28				
13					29				
14					30				
15					31				
16					no. of deviations				

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

FESOP Monthly Report

Source Name: W. Kendall and Sons, Inc.
 Source Address: 106 East 1st Street and 10270 West U.S. 30, Wanatah, Indiana 46390
 Mailing Address: P.O. Box 9, Wanatah, Indiana 46390
 FESOP No.: F091-5643-00112
 Facility: Surface Coating Booths, 106-#1, 106-#2, and 10270-#1
 Parameter: HAP emissions
 Limit: individual HAP: 9.4 tons per 365 day period, total HAP: 24 tons per 365 day period.

Month: _____ Year: _____

Day	greatest single HAP emission (tons)	name of greatest single HAP	total HAP emission (tons)	Day	greatest single HAP emission (tons)	name of greatest single HAP	total HAP emission (tons)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background And Description

Source Name: W. Kendall and Sons
Source Location: 106 East 1st Street, and 10270 West Highway 30,
Wanatah, Indiana 46390
County: LaPorte
SIC Codes: 3471, 3479
Operation Permit No.: F091-5643-00112
Permit Reviewer: Dana L. Brown

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from W. Kendall and Sons, relating to the operation of a metal parts coating plant.

Source Definition

This metal parts coating company consists of two (2) plants:

- (1) Plant 1 is located at 106 East 1st Street, Wanatah, Indiana 46390; and
- (2) Plant 2 is located at 10270 West U.S. 30, Wanatah, Indiana 46390.

Since the two (2) plants are located in adjacent properties, within one-half mile of each other, have the same SIC codes, 3471 and 3479, and are owned by one (1) company, W. Kendall and Sons, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

There are no existing permitted facilities prior to this review.

Unpermitted Emission Units and Pollution Control Equipment Under ENSR

This stationary source consists of the following unpermitted facilities/units:

Located at 106 East 1st Street, Wanatah, Indiana:

- (1) One (1) surface coating booth, identified as Spray booth 106-#1, with a maximum capacity of one unit per hour, with overspray controlled by dry filters, and exhausting to stack #1.
- (2) One (1) surface coating booth, identified as Spray booth 106-#2, with a maximum capacity of one unit per hour, with overspray controlled by dry filters, and exhausting to stack #2.

Located at 10270 West Highway 30, Wanatah, Indiana:

- (1) One (1) spray coating booth, identified as Spray booth 10270-#1, with a maximum capacity of one unit per hour, with overspray controlled by dry filters, and solvent recovered by distillation, and exhausting to vent #1.

Emission Units and Pollution Control Equipment Under ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. (2.5 MMBtu per hour Curing oven 106-#3, 0.8 MMBtu per hour Curing oven 10270-#2, and 0.5 MMBtu per hour Curing oven 10270-#3)
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (3) Combustion source flame safety purging on startup.
- (4) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (6) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (7) Paved and unpaved roads and parking lots with public access.
- (8) Emergency gasoline generators not exceeding 110 horsepower.
- (9) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (Grinding Shop and Abrasive blasting)

Enforcement Issue

IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:

Located at 106 East 1st Street, Wanatah:

- (1) Spray booth 106-#1;
- (2) Spray booth 106-#2.

Located at 10270 West Highway 30, Wanatah:

- (1) Spray booth 10270-#1.

IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

A complete construction permit application for the purposes of this review was received on March 29, 1996 and subsequently converted to a FESOP application. Additional information received on November 7, 1996 and July 24, 1997 makes the FESOP application administratively complete.

Emission Calculations

See Appendix A Emission Calculations for detailed calculations. (3 pages)

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	178.69
PM 10	148.83
SO ₂	0.0
VOC	145.9
CO	0.3
NO _x	1.7

See attached spreadsheets for detailed calculations. (6 pages)

HAP's	Potential Emissions (tons/year)
MEK	32.10
Toluene	3.32
Other	0.04
TOTAL	35.46

See attached spreadsheets for detailed calculations. (1 page)

- (a) The potential emissions (as defined in the Indiana Rule) of PM and PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (d) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD and Emission Offset applicability.

Limited Potential To Emit

- (a) The source has accepted a federally enforceable limit on potential to emit PM-10 and VOC of 99 tons per year, consisting of:
 - (i) 89 tons of PM-10 and 94 tons of VOC per year for the significant activities; and
 - (ii) 10 tons of PM-10 and 5 tons of VOC per year for the insignificant activities.
- (b) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/facility	Limited Potential to Emit (tons/year)			
	PM	PM-10	VOC	HAPs
Three (3) spray booths	249*	89.0	94.0	9.4 for individual, 24.0 for combination
Insignificant Activities		10.0	5.0	0.0
Total Emissions	249*	99	99	9.4 for individual, 24.0 for combination

* PM is limited to less than 250 tons per year, therefore 326 IAC 2-2 (PSD) will not apply.

Attached Table 1 summarizes the permit conditions and requirements.

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status (attainment or unclassifiable/severe, moderate, marginal, or maintenance nonattainment)
TSP	Attainment
PM-10	Attainment
SO ₂	Maintenance
Ozone	Attainment
Lead	Attainment
CO	Attainment
NO ₂	Attainment

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more one hundred (100) tons per year of PM. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM-10 and VOC emitted from this source is limited to 99 tons per 365 day period, rolled on a daily basis, and the amount of HAP emitted from this source is limited to 9.4 tons per consecutive 365 day period, rolled on a daily basis for any single HAP, and 24.0 tons per consecutive 365 day period, rolled on a daily basis for any combination of HAPs.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) overspray from the three (3) spray coating booths shall be limited by the following:
 Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$

P = process weight rate in tons per hour

The three (3) spray coating booths shall have dry filters in place during operation, in order to show compliance with this rule. This limit will also make 326 IAC 2-2 (PSD) not applicable.

- (b) The PM emissions from the insignificant abrasive blasting operations and from the insignificant grinding operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

The abrasive blasting operations are enclosed, therefore they are in compliance with this rule.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied in the three (3) spray coating booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the company and calculations made, the paint booth is in compliance with this requirement.

If coating with VOC content greater than 3.5 pounds per gallon less water are used, the following equation shall be used to determine compliance with 326 IAC 8-2-9, on a daily basis:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{3C}$$

Dc = density of coating, lb/gal
O = weight percent organics, %
W = percent volume water, %

Dw = density of water, lb/gal
Q = quantity of coating, gal/unit
C = total of coatings used, gal/unit

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The three (3) spray coating booths, have applicable compliance monitoring conditions as specified below:
 - (a) Record keeping of information sufficient to establish compliance with a daily volume weighted average of coatings applied in each booth, in pounds per gallon less water.
 - (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters while the booths are in operation.
 - (c) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
 - (d) Quarterly reports shall be submitted to OAM. These reports shall include the daily volume weighted average of coatings applied in each booth.

These monitoring conditions are necessary to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

Conclusion

The operation of this metal parts surface coating plant will be subject to the conditions of the attached proposed **FESOP No. F091-5643-000840**.

Table 1

Emission Unit:	Spray booths 106-#1, 106-#2 and 10270-#1	
Date of Construction:	1955	
Alternative Scenario:	none	
Pollution Control Equipment:	dry filters	
General Description of Requirement:	VOC emissions	Overspray control
Numerical Emission Limit:	3.5 lb/gallon less water	none
Regulation/Citation:	326 IAC 8-2-9	326 IAC 5-1
Compliance Demonstration:	daily volume weighted average	observations
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	n/a	n/a
Testing Method/Analysis:	n/a	n/a
Testing Frequency/Schedule:	n/a	n/a
Submittal of Test Results:	n/a	n/a
COMPLIANCE MONITORING		
Monitoring Description:	n/a	n/a
Monitoring Method:	n/a	n/a
Monitoring Regulation/Citation:	n/a	n/a
Monitoring Frequency:	n/a	n/a
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	info sufficient to determine daily volume weighted avg.	daily observations of dry filters and weekly observations of overspray
Recording Frequency:	daily	daily and weekly
Submittal Schedule of Reports:	quarterly	upon request
REPORTING REQUIREMENTS		
Information in Report:	daily volume weighted avg.	result of observations
Reporting Frequency/Submittal:	quarterly	upon request
Additional Comments:		

**Appendix A: Emission Calculations
Abrasive Blasting - PM**

Company Name: W. Kendall and Sons, Inc.
Address City IN Zip: 106 E. 1st Street and 10270 W. US 30, Wanatah, Indiana 46390
F: 091-5643
Pit ID: 00112
Reviewer: Dana L. Brown
Date: July 29, 1997

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

462
487
99
0.3125
0.3125

Flow Rate (FR) (lb/hr) = 2272.667 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =

0.010
2272.667
0 %
1

Uncontrolled Emissions =	22.73 lb/hr
	99.54 ton/yr

METHODOLOGY

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"
 Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
 Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)
 E = EF x FR x (1-w/200) x N
 w should be entered in as a whole number (if w is 50%, enter 50)

Appendix A: Emission Calculations

Abrasive Blasting - PM-10

Company Name: W. Kendall and Sons, Inc.
Address City IN Zip: 106 E. 1st Street and 10270 W. US 30, Wanatah, Indiana 46390
F: 091-5643
Pit ID: 00112
Reviewer: Dana L. Brown
Date: July 29, 1997

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

462
487
99
0.3125
0.3125

Flow Rate (FR) (lb/hr) = 2272.667 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =

0.007
2272.667
0 %
1

Uncontrolled Emissions =	15.91 lb/hr
	69.68 ton/yr

METHODOLOGY

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"
 Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
 Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)
 E = EF x FR x (1-w/200) x N
 w should be entered in as a whole number (if w is 50%, enter 50)

HAP Emission Calculations

Company Name: W. Kendall and Sons
Plant Location: 10270 US 30 W., Wanatah, IN 46390
County: LaPorte
Permit Reviewer: Dana L. Brown
Date: July 25, 1997

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % MEK/MIK	Weight % Benzene	Weight % Glycol Ethers	Weight % Other	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	MEK Emissions (ton/yr)	Benzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Other Emissions (ton/yr)	
VOCa54	9.19	1.000000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.50%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.81
VOCa55	19.4	0.750000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VOCa56	9.6	1.000000	1.00	1.96%	2.98%	0.00%	0.00%	0.00%	7.33%	0.00%	0.82	1.25	0.00	0.00	0.00	3.08	0.00	0.00
VOCa57	11.72	1.000000	1.00	0.00%	0.00%	0.00%	11.05%	34.85%	0.00%	0.00%	0.00	0.00	0.00	5.67	17.89	0.00	0.00	0.00
VOCa58	9.29	1.000000	1.00	0.00%	0.00%	0.85%	0.00%	0.00%	0.00%	5.95%	0.00	0.00	0.35	0.00	0.00	0.00	0.00	2.42
VOCa59	11.32	1.000000	1.00	0.00%	4.50%	0.00%	27.00%	0.00%	0.00%	0.90%	0.00	2.23	0.00	13.39	0.00	0.00	0.00	0.45
VOCa60	12.86	1.000000	1.00	0.00%	4.00%	0.00%	4.00%	0.00%	0.00%	0.00%	0.00	2.25	0.00	2.25	0.00	0.00	0.00	0.00
VOCa61	22.1	1.000000	1.00	27.00%	0.00%	0.00%	0.00%	4.60%	0.00%	0.00%	26.14	0.00	0.00	0.00	4.45	0.00	0.00	0.00
VOCa62	18.37	1.000000	1.00	5.00%	0.00%	0.00%	3.00%	1.00%	0.00%	0.00%	4.02	0.00	0.00	2.41	0.80	0.00	0.00	0.00
VOCa63	11.6	1.000000	1.00	4.00%	4.00%	0.00%	0.00%	12.00%	0.00%	0.00%	2.03	2.03	0.00	0.00	6.10	0.00	0.00	0.00
VOCa64	24.8	0.500000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VOCa65	9.38	1.000000	1.00	0.00%	0.00%	0.45%	0.50%	0.00%	0.00%	5.20%	0.00	0.00	0.18	0.21	0.00	0.00	0.00	2.14
VOCa66	9.12	1.000000	1.00	0.00%	8.31%	0.00%	80.35%	0.00%	0.00%	0.10%	0.00	3.32	0.00	32.10	0.00	0.00	0.00	0.04
VOCa67	10.81	1.000000	1.00	9.75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VOCa68	11.8	1.000000	1.00	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	10.34	0.00	0.00	0.00
VOCa69	8.97	1.000000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00	0.00	0.00	0.00	0.00	1.96	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 0.00 0.00 0.00 0.00 0.00 0.00 0.00

METHODOLOGY

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

Hapcalc.wk4/9/95

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Curing Oven**

Company Name: W. Kendall and Sons
Address City IN Zip: 106 East 1st Street, Wanatah, Indiana 46390
FESOP: 091-5643
Plt ID: 091-00112
Reviewer: Dana L. Brown
Date: March 18, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.5

21.9

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.1	0.1	0.0	1.1	0.1	0.2

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Curing Oven**

Company Name: W. Kendall and Sons
Address City IN Zip: 10270 West US 30, Wanatah, Indiana 46390
FESOP: 091-5643
Plt ID: 091-00112
Reviewer: Dana L. Brown
Date: March 18, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.8

7.0

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.4	0.0	0.1

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Curing Oven**

Company Name: W. Kendall and Sons
Address City IN Zip: 10270 West US 30, Wanatah, Indiana 46390
FESOP: 091-5643
Plt ID: 091-00112
Reviewer: Dana L. Brown
Date: March 18, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.5

4.4

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.2	0.0	0.0

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

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

Company Name: W. Kendall and Sons
Address City IN Zip: 10270 US 30 W., Wanatah, IN 46390
F: 091-5643
Plt ID: 00112
Reviewer: Dana L. Brown
Date: July 25, 1997

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
VOCa54	9.2	8.56%	0.0%	8.6%	0.0%	87.30%	1.00000	1.000	0.79	0.79	0.79	18.88	3.45	13.62	0.90	63%
VOCa55	19.4	17.39%	0.0%	17.4%	0.0%	62.60%	0.75000	1.000	3.37	3.37	2.53	60.73	11.08	19.48	5.39	63%
VOCa56	9.6	30.40%	0.0%	30.4%	0.0%	54.80%	1.00000	1.000	2.92	2.92	2.92	70.04	12.78	10.83	5.33	63%
VOCa57	11.7	12.90%	0.0%	12.9%	0.0%	76.50%	1.00000	1.000	1.51	1.51	1.51	36.29	6.62	16.54	1.98	63%
VOCa58	9.3	37.00%	0.0%	37.0%	0.0%	39.10%	1.00000	1.000	3.44	3.44	3.44	82.50	15.06	9.48	8.79	63%
VOCa59	11.3	30.00%	0.0%	30.0%	0.0%	48.00%	1.00000	1.000	3.40	3.40	3.40	81.50	14.87	12.84	7.08	63%
VOCa60	12.9	15.30%	0.0%	15.3%	0.0%	71.30%	1.00000	1.000	1.97	1.97	1.97	47.22	8.62	17.65	2.76	63%
VOCa61	22.1	13.24%	0.0%	13.2%	0.0%	72.72%	0.80000	1.000	2.93	2.93	2.34	56.18	10.25	24.86	4.02	63%
VOCa62	18.4	15.30%	0.0%	15.3%	0.0%	70.90%	0.90000	1.000	2.81	2.81	2.53	60.71	11.08	22.69	3.96	63%
VOCa63	11.6	26.00%	0.0%	26.0%	0.0%	62.50%	1.00000	1.000	3.02	3.02	3.02	72.38	13.21	13.91	4.83	63%
VOCa64	24.8	11.50%	0.0%	11.5%	0.0%	85.00%	0.50000	1.000	2.85	2.85	1.43	34.22	6.25	17.78	3.36	63%
VOCa65	9.4	33.60%	0.0%	33.6%	0.0%	50.90%	1.00000	1.000	3.15	3.15	3.15	75.64	13.80	10.09	6.19	63%
VOCa66	9.1	37.55%	0.0%	37.6%	0.0%	50.90%	1.00000	1.000	3.42	3.42	3.42	82.19	15.00	9.23	6.73	63%
VOCa67	10.8	31.30%	0.0%	31.3%	0.0%	53.30%	1.00000	1.000	3.38	3.38	3.38	81.20	14.82	12.04	6.35	63%
VOCa68	11.8	29.66%	0.0%	29.7%	0.0%	51.00%	1.00000	1.000	3.50	3.50	3.50	84.00	15.33	13.45	6.86	63%
VOCa69	9.0	38.00%	0.0%	38.0%	0.0%	47.00%	1.00000	1.000	3.41	3.41	3.41	81.81	14.93	9.01	7.25	63%
Solvent	7.6	100.00%	0.0%	100.0%	0.0%	0.0%	1.00000	1.000	7.60	7.60	7.60	182.40	33.29	0.00	ERR	63%

State Potential Emissions

Add worst case coating to all solvents

50.33

1207.89

220.44

233.52

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used