

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**J.M. Hutton and Co., Inc.
1117 North E St. , 1501 South 8th St.
Richmond, Indiana 47375**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T177-6466-00083	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary burial casket manufacturing and surface coating operation at two (2) separate plants.

Responsible Official: A. B. Wright - Vice President
Source Address: 1501 South 8th St., Richmond, Indiana 47375 (Plant 1); and
1117 North E St., Richmond, Indiana 47375 (Plant 2)
Mailing Address: P.O. Box 129 Richmond, Indiana 47375-0129
SIC Code: 3995
County Location: Wayne
County Status: Nonattainment for Sulfur Dioxide
Attainment or unclassified for all other criteria pollutants;
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) The plant located at Plant 1 consists of one (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:
 - (a) four (4) spray coating booths, respectively identified as Booths S1, S2, S3, and S9, each utilizing a high volume - low pressure (HVLP) application system with dry filters for particulate control, and each exhausting through one (1) stack (S/V ID S001, S002, S003, S009) respectively;
 - (b) two (2) spray coating booths, respectively identified as Booth S4 and Booth S5, each utilizing a high volume - low pressure (HVLP) application system with a waterwash for particulate control, and each exhausting through one (1) stack (S/V ID S004, S005) respectively; and
 - (c) one (1) spray coating booth, identified as Booth S6, utilizing an electrostatic airless spray gun with a waterwash for particulate control, and exhausting through one (1) stack (S/V ID S006).
- (2) Plant 2 consists of the following:
 - (a) one (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of three (3) spray coating booths, respectively identified as Booths E1, E2, E3, each utilizing a high volume - low pressure (HVLP) application system with dry filters for particulate control, and each exhausting through one stack (S/V ID E001, E002, E003) respectively;

- (b) one (1) wooden casket surface coating line with a maximum capacity of coating two (2) caskets per hour, consisting of three (3) surface coating booths respectively identified as Booths E7, E8, and E9, utilizing high volume - low pressure (HVLP) application for Booths E7 and E8, and manual hand-wipe application for Booth E9. Each booth is exhausting through one (1) stack (S/V ID E007, E008, and E009) respectively; and
- (c) one (1) spray coating booth, identified as Booth E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a high volume - low pressure (HVLP) application system with dry filters for particulate control, and exhausting through one (1) stack (S/V ID E006).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) One (1) touch-up surface coating booth located at Plant 2, identified as Booth E4, utilizing HVLP application, and exhausting through one (1) stack (S/V ID E004).

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

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

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

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, 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 2-7-5(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 2-7-7(a)]

- (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 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(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. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(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; or
 - (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.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (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) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and 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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (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 based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;

- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

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

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, .

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (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 describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, 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 Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (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 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (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(34).

- (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 2-7-4(c)(9) 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 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps 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) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or

- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, 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 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

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, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) 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) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, 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 being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) 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) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any 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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, 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.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(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 Part 70 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 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (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 Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 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 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.

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit VOC is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [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) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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. The requirement that the inspector be accredited is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in 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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, 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 may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 22, 1996
- (b) 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.
- (c) 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.
- (d) 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.
- (e) 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 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 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 a part of the compliance certification submitted under 326 IAC 2-7-6(5), 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.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (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) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps 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 response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring 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 process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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 [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission 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

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

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, 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) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, 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 stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (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 for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (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 preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (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 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and 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
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Facility Description [326 IAC 2-7-5(15)] - Surface Coating Operations

- (1) Plant 1 consists of one (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:
 - (a) four (4) spray coating booths, respectively identified as Booths S1, S2, S3, and S9, each utilizing a high volume - low pressure (HVLP) application system with dry filters for particulate control, and each exhausting through one (1) stack (S/V ID S001, S002, S003, S009) respectively;
 - (b) two (2) spray coating booths, respectively identified as Booth S4 and Booth S5, each utilizing a high volume - low pressure (HVLP) application system with a waterwash for particulate control, and each exhausting through one (1) stack (S/V ID S004, S005) respectively; and
 - (c) one (1) spray coating booth, identified as Booth S6, utilizing an electrostatic airless spray gun with a waterwash for particulate control, and exhausting through one (1) stack (S/V ID S006).
- (2) Plant 2 consists of the following:
 - (a) one (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of three (3) spray coating booths, respectively identified as Booths E1, E2, E3, each utilizing a high volume - low pressure (HVLP) application system with dry filters for particulate control, and each exhausting through one stack (S/V ID E001, E002, E003) respectively; and
 - (b) one (1) wooden casket surface coating line with a maximum capacity of coating two (2) caskets per hour, consisting of three (3) surface coating booths respectively identified as Booths E7, E8, and E9, utilizing high volume - low pressure (HVLP) application for Booths E7 and E8, and manual hand-wipe application for Booth E9. Each booth is exhausting through one (1) stack (S/V ID E007, E008, and E009) respectively.
 - (c) one (1) spray coating booth, identified as Booth E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a high volume - low pressure (HVLP) application system with dry filters for particulate control, and exhausting through one (1) stack (S/V ID E006).
 - (d) one (1) touch-up surface coating booth located at Plant 2, identified as Booth E4, utilizing HVLP application, and exhausting through one (1) stack (S/V ID E004);

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

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The input VOC usage at all surface coating booths source-wide (E1,2,3,4,6,7,8,9 and S1,2,3,4,5,6,9) shall be limited to 248.72 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents. This limit, when combined with emissions from combustion at the source, is equivalent to a source-wide potential to emit of less than 250 tons of VOC per twelve (12) consecutive month period. Compliance with this usage limitation shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable

D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

- (a) Pursuant to Construction Permit CP-177-3461-00053, issued October 25, 1994, and 326 IAC 8-1-6 (General Reduction Requirements), the surface coating booths located at Plant 2, identified as E1, E2, E3, and E4, shall comply with the following requirements:
1. Utilize only high volume-low pressure (HVLP) application equipment at all times that the booths are in operation, with the exception of shading operations.

(HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.)
 2. Air atomization equipment may be used for shading operations (shading involves the application of a narrow line of coating on the casket).
 3. Water base primer shall be used for all primer applications due to the significantly reduced concentrations of VOC.
- (b) Pursuant to Construction Permit CP-177-3462-00054, issued September 27, 1994, and 326 IAC 8-1-6 (General Reduction Requirements), the VOC emission from the coating line located at Plant 1, which includes the Booths identified as S1, S2, S3, S4, S5, S6 and S9, shall utilize Best Available Control Technology in accordance with 326 IAC 8-1-6 (General Reduction Requirements).
1. This use of six (6) high volume-low pressure (HVLP) spray guns and one (1) electrostatic airless spray gun with a minimum transfer efficiency of 65% on each spray gun.
 2. These shall be used at all times that the coating line is operated.
- (c) The input VOC usage at the booth identified as E6, located at Plant 2, shall not exceed 25.0 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents. Any change or modification which may increase potential emissions in excess of 25 tons per year shall be subject to the Best Available Control Technology requirements under 326 IAC 8-1-6 (General Reduction Requirements), before such change may occur.

D.1.3 Volatile Organic Compounds [326 IAC 8-2-12]

The wooden casket surface coating line at the plant located at Plant 2, which consists of three (3) booths identified as E7, E8, and E9, is subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). The surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High Volume Low Pressure HVLP	Aerosol Spray Cans

High Volume Low Pressure (HVLP) Spray Application is considered to be an Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

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

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from each spray booth listed above 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:

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

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each facility and any control devices

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 or the PM limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) 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 VOC Emissions

Compliance with Condition D.1.1 and D.1.2(c) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve consecutive month period.

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

D.1.9 Particulate Matter (PM)

The dry filters or waterwash for PM control shall be in operation at all times when each respective spray booth (listed above) is in operation.

D.1.10 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 from the surface coating booth stacks (previously listed) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (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 Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and/or D.1.2(c), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2(c).
 - (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 month;
 - (4) The cleanup solvent usage for each month;

- (5) The total VOC usage for each month; and
- (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2(a), the Permittee shall maintain records of MSDS or other manufacturers specifications for the type of primer used during application to ensure the usage of a water based primer.
- (c) To document compliance with Condition D.1.9 and D.1.10, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 (c) 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.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: J.M. Hutton and Co., Inc.
Source Address: 1117 North E St. Richmond, IN 47375
and 1501 South 8th St., Richmond, IN 47375
Mailing Address: P.O. Box 129, Richmond, IN 47375-0129
Part 70 Permit No.: T177-6466-00083

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 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: J.M. Hutton and Co., Inc.
Source Address: 1117 North E St. Richmond, IN 47375
and 1501 South 8th St., Richmond, IN 47375
Mailing Address: P.O. Box 129, Richmond, IN 47375-0129
Part 70 Permit No.: T177-6466-00083

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: J.M. Hutton and Co., Inc.
Source Address: 1117 North E St. Richmond, IN 47375
and 1501 South 8th St., Richmond, IN 47375
Mailing Address: P.O. Box 129, Richmond, IN 47375-0129
Part 70 Permit No.: T177-6466-00083
Facility: Source-wide
Parameter: VOC Emissions
Limit: VOC usage at all surface coating operations shall be limited to 248.72 tons per year;

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

Part 70 Quarterly Report

Source Name: J.M. Hutton and Co., Inc.
Source Address: 1117 North E St. Richmond, IN 47375
and 1501 South 8th St., Richmond, IN 47375
Mailing Address: P.O. Box 129, Richmond, IN 47375-0129
Part 70 Permit No.: T177-6466-00083
Facility: Booth E6
Parameter: VOC usage;
Limit: 24 tons per year to avoid 326 IAC 8-1-6;

YEAR: _____

Month	VOC Usage	VOC Usage	VOC Emissions
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

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

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: J.M. Hutton and Co., Inc.
Source Address: 1117 North E St. Richmond, IN 47375
and 1501 South 8th St., Richmond, IN 47375
Mailing Address: P.O. Box 129, Richmond, IN 47375-0129
Part 70 Permit No.: T177-6466-00083

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review

Source Background and Description

Source Name: J.M. Hutton and Co., Inc.
Source Location: 1501 South 8th St., Richmond, Indiana 47375; and
1117 North E St., Richmond, Indiana 47375
County: Wayne
SIC Code: 3995
Operation Permit No.: T177-6466-00083
Permit Reviewer: Jeremy Magliaro / EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from J.M. Hutton and Co., Inc. relating to the operation of two plants located in Richmond, Indiana which construct and surface coat burial caskets.

Source Definition

This casket manufacturing and surface coating company consists of two (2) plants:

- (1) Plant 1 is located at 1501 South 8th Street, Richmond, Indiana; and
- (2) Plant 2 is located at 1117 North E Street, Richmond, Indiana.

Since the two (2) plants are located on adjacent properties, (the two plants are located in close proximity in the same city and exchange raw materials, therefore they are considered to be located on adjacent properties per U.S. EPA guidance), have the same SIC codes and are owned by one (1) company, they will be considered as one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices located at two separate plants:

- (1) Plant 1 consists of one (1) metal casket surface coating line, constructed in 1994, with a maximum capacity of coating eleven (11) caskets per hour, consisting of the following:
 - (a) four (4) spray coating booths, respectively identified as Booths S1, S2, S3, and S9, each utilizing a high volume - low pressure (HVLP) application system with dry filters for particulate control, and each exhausting through one (1) stack (S/V ID S001, S002, S003, S009) respectively;

- (b) two (2) spray coating booths, respectively identified as Booth S4 and Booth S5, each utilizing a high volume - low pressure (HVLP) application system with a waterwash for particulate control, and each exhausting through one (1) stack (S/V ID S004, S005) respectively; and
 - (c) one (1) spray coating booth, identified as Booth S6, utilizing an electrostatic airless spray gun with a waterwash for particulate control, and exhausting through one (1) stack (S/V ID S006).
- (2) Plant 2 consists of the following:
- (a) one (1) metal casket surface coating line with a maximum capacity of coating five (5) caskets per hour, consisting of three (3) spray coating booths, respectively identified as Booths E1, E2, E3 each utilizing a high volume - low pressure (HVLP) application system with dry filters for particulate control, and each exhausting through one stack (S/V ID E001, E002, E003) respectively; and
 - (b) one (1) wooden casket surface coating line with a maximum capacity of coating two (2) caskets per hour, consisting of three (3) surface coating booths respectively identified as Booths E7, E8, and E9, utilizing high volume - low pressure (HVLP) application for Booths E7 and E8, and manual hand-wipe application for Booth E9. Each booth is exhausting through one (1) stack (S/V ID E007, E008, and E009) respectively;

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units located at Plant 2:

- (c) one (1) spray coating booth, identified as Booth E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a high volume - low pressure (HVLP) application system with dry filters for particulate control, and exhausting through one (1) stack (S/V ID E006).

There are no unpermitted facilities operating at the plant located at 1501 South 8th Street, Richmond, Indiana during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

All unpermitted emission units listed above will be reviewed under the ENSR process.

There are no new emission units at this source during this review.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
 - (a) one (1) 1.5 mmBtu/hr boiler located at Plant 2;
 - (b) one (1) 6.0 mmBtu/hr boiler located at Plant 1;

- (2) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (3) Paved and unpaved roads and parking lots with public access.
- (4) Filter or coalescer media changeout.
- (5) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling towers.
- (6) The following facilities with emissions below insignificant threshold levels:
 - (a) one (1) touch-up surface coating booth located at Plant 2, identified as Booth E4, and exhausting through one (1) stack (S/V ID E004);
 - (b) one (1) wood-working operation located at Plant 2, with emissions controlled by two (2) cyclones;
 - (c) one (1) wood-fired boiler with a maximum rating of 1.2 million (mm) British thermal unit (Btu) per hour located at Plant 2;

Existing Approvals

Plant 1 has been operating under the following approvals:

- (1) CP 177-3462-00054, issued on September 27, 1994.

Plant 2 has been operating under the following approvals:

- (1) CP 177-3461-00053, issued October 25, 1994; and
- (2) Registration for operation and exemption from operation, issued March 18, 1982.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
 - (1) one (1) spray coating booth, identified as Booth E6, with a maximum capacity of coating five (5) caskets per hour, utilizing a high volume - low pressure (HVLV) application system with dry filters for particulate control, and exhausting through one (1) stack (S/V ID E006).
- (b) 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 Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on August 22, 1996. Additional information was received on October 1, 1996.

A notice of completeness letter was mailed to J.M. Hutton and Co., Inc. on October 29, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (seven (7) 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	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulate, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
toluene	greater than 10
xylene	less than 10
Ethylene glycol	greater than 10
Methyl isobutyl ketone	less than 10
Methyl ethyl ketone	greater than 10
Dimethyl Pthalate	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of VOC 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 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) 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 (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1996 emission statement data for VOC and HAP emissions. The PM/PM-10, SO₂, NO_x, and CO actual emissions are based on potential emission/usage rates multiplied by 1996 actual operating hours (1,952 hours Plant 1, and 2,018 hours for Plant 2).

Pollutant	Actual Emissions (tons/year)
PM	4.03
PM-10	3.80
SO ₂	0.00
VOC	95.7
CO	0.20
HAP (total)	62.53
NO _x	0.06

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs (total)
Source-wide* surface coating	0.79	0.79	--	248.72	--	--	166.94
Combustion	4.06	3.09	0.03	0.28	1.48	3.57	--
Woodworking	12.26	12.26	--	--	--	--	--
Total Emissions	17.11	16.14	0.03	249.0	1.48	3.57	166.94

* Total VOC usage at all surface coating operations (source-wide), shall be limited 248.72 tons per year. This VOC usage limit shall limit source-wide potential VOC emissions to 249 tons per year to avoid major source status under 326 IAC 2-2 (Prevention of Significant Deterioration).

County Attainment Status

The source is located in Wayne County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	primary nonattainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen NO_x are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) (40 CFR Part 60) applicable to this source.
- (b) The wooden casket surface coating line at plant located at Plant 2 is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart JJ (Wood Furniture Coating Operations) because wooden caskets do not qualify as "wood furniture" under U.S. EPA interpretation.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

J.M. Hutton and Co., Inc. has indicated that it wishes to maintain its status as a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, the source shall limit total source-wide VOC emissions to 249 tons per twelve (12) consecutive month period. This limit is comprised of the following:

- (a) VOC usage at all surface coating booths source-wide (E1,2,3,4,,6,7,8,9 and S1,2,3,5,6,9) shall be limited to 248.72 tons per twelve (12) consecutive month period;

This usage limitation combined with VOC emissions from combustion at the source, (see Appendix A, pages 6 and 7 of 7 for detailed emissions calculations) shall limit source-wide VOC emissions to no more than 249 tons per twelve (12) consecutive month period:

$$248.72 \text{ tons VOC/year} + 0.28 \text{ tons VOC/year from combustion} = 249.00 \text{ tons VOC per year};.$$

Therefore, the requirements under 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable, and pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a minor source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC in Wayne County. 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 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)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) overspray from the spray coating facilities 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 source utilizes dry filters and waterwash for particulate matter control on their surface coating booths to comply with 326 IAC 6-3-2 (Process Operations).

326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), new facilities (as of January 1, 1980), which have potential VOC emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8, shall reduce VOC emissions using best available control technology (BACT).

- (a) Pursuant to Construction Permit CP-177-3461-00053, issued October 25, 1994, the surface coating booths located at Plant 2, identified as E1, E2, E3, and E4, shall comply with the following requirements:
 - 1. Utilize only high volume-low pressure (HVLP) application equipment at all times that the booths are in operation with the exception of shading operations. (HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.)

2. Air atomization equipment may be used for shading operations (shading involves the application of a narrow line of coating on the casket).
3. Water base primer shall be used for all primer applications due to the significantly reduced concentrations of VOC.

Review of the equipment used in Booths E1, E2, E3, and E4 indicate that they use HVLP application systems. Further review of MSDS sheets also indicates that water based primer is used in Booth E1, therefore the booths are in compliance with 326 IAC 8-1-6 (General Reduction Requirements).

- (b) Pursuant to Construction Permit (CP-177-3462-00054, issued September 27, 1994, the VOC emission from the coating line located at Plant 1, which includes the Booths identified as S1, S2, S3, S4, S5, S6 and S9, shall utilize Best Available Control Technology in accordance with 326 IAC 8-1-6 (General Reduction Requirements).
 1. This includes the installation of six (6) high volume-low pressure (HVLP) spray guns and one (1) electrostatic airless spray gun with a minimum transfer efficiency of 65% on each spray gun.
 2. These shall be used at all times that the coating line is operated.

Review of the equipment used in Booths S1, S2, S3, S4, S5, S6 and S9 indicates that HVLP application systems are used in six (6) of the booths and an electrostatic airless spray gun is used in the booth identified as S6. Therefore, the coating line located at Plant 1 is in compliance with 326 IAC 8-1-6 (General Reduction Requirements).

- (c) The facility identified as Booth E6, located at Plant 2, has potential VOC emissions (based on worst-case VOC usage) of 20.35 tons per year, therefore the BACT requirements under 326 IAC 8-1-6 (General Reduction Requirements) do not apply.
- (d) The facilities identified as Booths E7, E8, and E9, located at Plant 2, are subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), therefore the requirements under 326 IAC 8-1-6 (General Reduction Requirements) are not applicable.

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

Pursuant to 326 IAC 8-2-9 (b)(10) (Miscellaneous Metal Coating Operations), an operation which applies coatings to metal burial caskets, if the source is not located in or adjacent to a county designated as nonattainment for ozone, is not applicable to the requirements under 326 IAC 8-2-9 (Miscellaneous Metal Coatings). The metal burial casket surface coating lines at both J.M. Hutton plants, therefore, are not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The wooden casket surface coating line at the plant located at Plant 2 is subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because it qualifies as "any other coated furnishings made of solid wood, wood composition or simulated wood products. The surface coatings applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High Volume Low Pressure HVLP	Aerosol Spray Cans

The only wooden casket surface coating line at the source is located at Plant 2, and is comprised of Booths E7, E8 and E9. Booths E7 and E8 utilize HVLP application systems while Booth E9 utilizes a hand wipe application technique. Therefore, the source is in compliance with 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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 source shall maintain MSDS and/or other equivalent manufacturers specifications on the primer used for application in the booths identified as E1, E2, E3, and/or E4 to ensure that water based primer is being utilized at all times for all primer applications within these booths. This monitoring condition is necessary to ensure compliance with the BACT requirements of 326 IAC 8-1-6 (General Reduction Requirements) (pursuant to Construction Permit CP-177-3461-00053, issued October 25, 1994), and 326 IAC 2-2 (Prevention of Significant Deterioration).
- (2) The source shall limit source-wide VOC emissions to 249 tons per twelve (12) consecutive month period on a rolling monthly basis. This limit consists of VOC emissions from the following emission units:
 - (a) VOC usage at all surface coating booths source-wide (E1,2,3,4,,6,7,8,9 and S1,2,3,5,6,9) shall be limited to 248.72 tons per twelve (12) consecutive month period;
 - (b) VOC emissions from source-wide combustion (see Appendix A, pages 6 and 7 of 7 for more detailed emissions calculations).

Coating usage shall be recorded monthly and a quarterly report shall be submitted to OAM Compliance Section. This report shall include total VOC usage from surface coating in tons per month and tons per twelve (12) consecutive month period. This compliance monitoring requirement is necessary to maintain the status as a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration).

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) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) The surface coating booth E6, which is being permitted under Enhanced New Source Review (ENSR), will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.
- (c) See attached calculations for detailed air toxic calculations (pages 3 and 5 of 7, Appendix A).

Conclusion

The operation of this burial casket production and surface coating plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T177-6466-00083.

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

Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit
and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	J.M. Hutton and Co., Inc.
Source Location:	1501 South 8 th St., Richmond, Indiana 47375; and 1117 North E St., Richmond, Indiana 47375
County:	Wayne
SIC Code:	3995
Operation Permit No.:	T177-6466-00083
Permit Reviewer:	Jeremy Magliaro / EVP

On March 13, 1998, the Office of Air Management (OAM) had a notice published in the Palladium Item, Richmond, Indiana, stating that J.M. Hutton and Co., Inc. had applied for a Part 70 Operating Permit and Enhanced New Source Review for their burial casket production operation. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit (changes in bold or strikeout for emphasis):

- 1) In Section A, Source Summary, on page 4 of 37 of the Part 70 Operating Permit, the following language has been included:

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.~~
The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

- 2) In condition A.3, on page 5 of 37, and in Section D.1, page 27 of 37, of the Part 70 Operating Permit, the touch-up surface coating booth identified as E4 has been added as follows:
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (a) **one (1) touch-up surface coating booth located at Plant 2, identified as Booth E4, utilizing HVLP application, and exhausting through one (1) stack (S/V ID E004).**

- 3) Condition A.5 (Prior Permit Conditions Superseded) on page 5 of 37 has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

- 4) Condition B.1, (Permit No Defense) part (b), on page 6 of 37, has been changed as follows:

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

- 5) Condition B.8, (Duty to Supplement and Provide Information), part (c), on page 7 of 37, has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

- 6) Condition B.11 (Annual Compliance Certification) part (c), on page 8 of 37, has been changed as follows:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) **Any insignificant activity that has been added without a permit revision; and**

- ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 7) Condition B.12, (Preventive Maintenance Plan) on page 8 of 37, has been changed as follows:
B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]
-

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ 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) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.
- 8) Condition B.14 (Permit Shield), on page 10 of 37 has been changed to read as follows:
B.14 Permit Shield [326 IAC 2-7-15]
-

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.**

Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**

- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- ~~(b)~~ (c) ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(c)~~ (d) ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**~~
- ~~(d)~~ (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e)~~ (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(f)~~ (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

9) Condition B.16 (Deviations from Permit Requirements and Conditions) on page 11 of 37, has been changed as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps 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) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- ~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- ~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

10) Condition B.18, (Permit Renewal), part (a) on page 12 of 37, has been changed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

- 11) Condition B.19 (Administrative Permit Amendment) on page 13 of 37, Condition B.20 (Minor Permit Modification) on page 14 of 37, and B.21 (Significant Permit Modification) on page 14 of 37, have all been combined into one condition numbered B.19 (Permit Amendment and Modification) shown below. The new B.19 condition will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**

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

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

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

- 12) Condition B.26 (now B.24) (Inspection and Entry), on page 16 of 37, has been changed as follows:

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **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 Part 70 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 2-7-6(6)]

- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
- (2) **The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

13) Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) on page 17 of 37, has been changed as follows:

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **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(34).**

14) Condition B.28 (now B.26) (Annual Fee Payment), on page 17 of 37 has been changed as follows:

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

15) Condition B.28 (Credible Evidence), has been added to the end of Section B. It reads as follows:

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

16) Condition C.1 (PSD Minor Source Status), on page 18 of 37, has been changed to read as follows;

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOC is limited to ~~240 tons~~ **less than 250 tons** per ~~twelve (12) consecutive month period~~ **year**. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

17) Condition C.2 (Particulate matter Emission Limitations for Processes with Process Weight Rates less than One Hundred Pounds per Hour), is a new condition that has been added to the permit. The remainder of Section C has been renumbered accordingly.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

18) Condition C.6 (now C.7) (Operation of Equipment), on page 18 of 37, has been changed as follows:

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

19) Condition C.7, (now C.8) (Asbestos Abatement Projects - Accreditation) on page 18 of 37, and C.12 (Asbestos Abatement Projects) on page 20 of 37, have been combined into one condition which will read as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [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) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**

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

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

(A) **Asbestos removal or demolition start date;**

(B) **Removal or demolition contractor; or**

(C) **Waste disposal site.**

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

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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. The requirement that the inspector be accredited is federally enforceable.

20) Condition C.8, (now C.9) (Performance Testing), on page 19 of 37, the rule cite has been changed to 326 IAC 3-6, and the following changes have been made:

C.9 Performance Testing ~~[326 IAC 3-2.1]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in 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**

no later than thirty-five (35) days before prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

21) Condition C.9 (now C.10) (Compliance Schedule) has been changed as follows:

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

22) Condition C.10 (now C.11) (Compliance Monitoring) has been changed to read as follows:

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, 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 **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

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

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the 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(34)

22) Condition C.11, (now C.12) (Monitoring Methods), on page 20 of 37, has been changed as follows:

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

23) Condition C.12 (Asbestos Abatement Projects), on page 20 of 37, has been deleted. It is now Condition C.8 (Asbestos Abatement Projects)

~~C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [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) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~
- ~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~
- ~~(2) If there is a change in the following:~~
- ~~(A) Asbestos removal or demolition start date;~~
- ~~(B) Removal or demolition contractor; or~~
- ~~(3) Waste disposal site.~~
- ~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~
- ~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3):~~
- ~~All required notifications shall be submitted to:~~
- ~~Indiana Department of Environmental Management
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. The requirement that the inspector be accredited is federally enforceable.~~

24) Condition C.14 (Risk Management Plan), on page 21 of 37, has been changed to read as follows:

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 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 a part of the compliance certification submitted under 326 IAC 2-7-6(5), 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.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

25) In Condition C.15 (Compliance Monitoring - Failure to Take Response Steps), on page 22 of 37, the rule cite has been changed as follows:

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

26) In Condition C.16 (Actions Related to Noncompliance Demonstrated by a Stack Test), on page 23 of 37, a rule cite and new language has been added as follows:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. 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.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

27) Condition C.17 (Emission Statement) part (a), on page 23 of 37, has been changed as follows:
C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

-
- (a) The Permittee shall submit an ~~certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

28) Condition C.19 (General Record Keeping Requirements), on page 24 of 37, has been changed as follows:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][**326 IAC 2-7-6**]

-
- (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 **for a minimum of three (3) years** and available **upon the request** within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** providing they are made available within thirty (30) days after written request. **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.**

29) Condition C.20 (General Reporting Requirements), on page 25 of 37, has been changed as follows:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

-
- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a ~~Quality~~ **Quarterly Compliance Monitoring Report**. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and 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
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
 - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 30) Section D.1 (Facility Operating Conditions) the following rule cite has been added to the facility description box in all D sections.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- 31) Condition D.1.1, page 27 of 37 of the Part 70 Operating Permit has been revised as follows:
D.1.1 ~~Volatile Organic Compounds PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]~~
The input VOC usage at all surface coating booths source-wide (E1,2,3,4,6,7,8,9 and S1,2,3,4,5,6,9) shall be limited to 248.72 tons per twelve (12) consecutive month period, **including coatings, dilution solvents, and cleaning solvents.** This limit, when combined with emissions from combustion at the source, is equivalent to a source-wide potential to emit of ~~249.0~~ **less than 250** tons of VOC per twelve (12) consecutive month period. Compliance with this usage limitation shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21**, not applicable.

32) Condition D.1.2 (c), page 28 of 37 of the Part 70 Operating Permit has been revised as follows:
D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

(c) The **input** VOC usage at the booth identified as E6, located at Plant 2, shall not exceed ~~24.0~~ **25.0** tons per twelve (12) consecutive month period, **including coatings, dilution solvents, and cleaning solvents**. Any change or modification which may increase potential emissions ~~to in excess of 25 tons per twelve (12) consecutive month period~~ **year** shall be subject to the Best Available Control Technology requirements under 326 IAC 8-1-6 (General Reduction Requirements), before such change may occur.

33) Condition D.1.6, page 29 of 37 of the Part 70 Operating Permit has been revised as follows:
D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit in D.1.1 or the PM limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

34) Condition D.1.7, page 29 of 37 of the Part 70 Operating Permit has been revised as follows:
D.1.7 Volatile Organic Compounds (VOC)

Compliance with the 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)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **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.

35) Condition D.1.8 (VOC Emissions), is a new condition that has been added to the permit:
D.1.8 VOC Emissions

Compliance with Condition D.1.1 and D.1.2 (c) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve consecutive month period.

36) Condition D.1.9 (now D.10), (Monitoring) on page 29 of 37, has been revised as follows:
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 **from the surface coating booth stacks (previously listed)** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(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 Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission~~ **a noticeable change in overspray emission, or evidence of overspray emission** is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

FORMS:

- 1) On the Part 70 Operating Permit Certification Form, on page 32 of 37, the checkbox and wording for "Emergency/Deviation Occurrence Reporting Form" has been deleted.
- 2) On the Emergency/Deviation Occurrence Reporting Form, page 33 of 37, the wording "attach a signed certification to complete this report" on the bottom of the page has been deleted.
- 3) The Quarterly Compliance Report, page 37 of 37, is now called the Quarterly Compliance Monitoring Report. The changes are shown on the next page.

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

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: J.M. Hutton and Co., Inc.
 Source Address: 1117 North E St. Richmond, IN 47375
 and 1501 South 8th St., Richmond, IN 47375
 Mailing Address: P.O. Box 129, Richmond, IN 47375-0129
 Part 70 Permit No.: T177-6466-00083

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ **in the box marked "No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

~~**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:**~~

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	_____ No _____ _____ Deviations _____

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Appendix A: Emissions Calculations.

Company Name: J.M Hutton and Co., Inc.
Address City IN Zip: 1117 North E St., Richmond, IN 47375
Title V: T177-6466-00083
Reviewer: JM/EVP
Date: Januray 26, 1998

TOTAL POTENTIAL EMISSIONS SUMMARY

Potential Controlled Emissions (tons/yr)

Pollutant	Surface Coating	Combustion	Woodworking	Total
PM	1.32	4.06	12.26	17.64
PM-10	1.32	3.09	12.26	16.67
SO2	--	0.03	--	0.03
NOx	--	3.57	--	3.57
VOC	413.55	0.28	--	413.83
CO	--	1.48	--	1.48
Single HAP	152.98	--	--	152.98
Total HAPs	277.58	--	--	277.58

Limited Controlled Emissions (tons/yr)

Pollutant	Surface Coating	Combustion	Woodworking	Total
PM	0.79	4.06	12.26	17.11
PM-10	0.79	3.09	12.26	16.14
SO2	--	0.03	--	0.03
NOx	--	3.57	--	3.57
VOC	248.72	0.28	--	249.00
CO	--	1.48	--	1.48
Single HAP	92.00	--	--	92.00
Total HAPs	166.94	--	--	166.94

Total source-wide VOC emissions shall be limited to 249 tons per twelve (12) consecutive month period:

VOC usage from surface coating operations shall be limited to 248.72 tons per twelve (12) consecutive month period.

This is equivalent to an operational limitation of $248.72/413.55 = 0.6014$ or 60.14%

Therefore: (a) limited HAP emissions are equal to $152.98(0.6014) = 92.00$ tons/yr; and $277.58(0.6014) = 166.94$ tons/yr.

(b) limited PM/PM10 emissions are equal to $1.32(0.6014) = 0.79$ tons PM/year.

Total Potential Emissions based on rated capacity assuming operations at 8,760 hours per year.

(See pages 2-7, Appendix A, for more detailed emissions calculations)

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

Company Name: J.M Hutton & Co., Inc.
Address City IN Zip: 1501South 8th St. Richmond, IN 47375
Title V: T177-6466-00083
Reviewer: JM/EVP
Date: January 26, 1998

Potential Emissions (uncontrolled):

Material (as applied)	Booth	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 (1)	
WB Primer*	S1	10.07	58.60%	48.09%	10.51%	58.16%	27.68%	0.428	11.00	2.5	1.06	4.98	119.59	21.82	30.09	5.88	0.65	
H.H Brush*	S2	7.14	87.66%	0.00%	87.66%	0.00%	9.11%	0.029	11.00	6.3	6.26	1.99	47.75	8.71	0.43	105.70	0.65	
Touch-up Prime*	S3	8.46	69.78%	0.00%	69.78%	0.00%	16.28%	0.018	11.00	5.9	5.90	1.19	28.68	5.23	0.79	55.79	0.65	
Color NM	S4	9.11	61.52%	0.00%	61.52%	0.00%	21.36%	0.018	11.00	5.6	5.60	1.12	26.78	4.89	1.07	40.37	0.65	
Color M*	S4	7.65	82.11%	0.00%	82.11%	0.00%	11.25%	0.055	11.00	6.3	6.28	3.79	91.04	16.61	1.27	85.90	0.65	
N.M. Ready	S4	7.53	83.88%	0.00%	83.88%	0.00%	8.83%	0.003	11.00	6.3	6.32	0.19	4.45	0.81	0.05	110.05	0.65	
HD Dye	S4	7.11	90.46%	0.00%	90.46%	0.00%	6.92%	0.009	11.00	6.4	6.43	0.62	14.99	2.74	0.10	142.99	0.65	
WB Color	S4	8.90	69.19%	59.14%	10.05%	63.45%	24.98%	0.008	11.00	2.4	0.89	0.08	2.00	0.36	0.39	5.51	0.65	
Color NM	S5	9.11	61.52%	0.00%	61.52%	0.00%	21.36%	0.018	11.00	5.6	5.60	1.12	26.78	4.89	1.07	40.37	0.65	
Color M*	S5	7.65	82.11%	0.00%	82.11%	0.00%	11.25%	0.055	11.00	6.3	6.28	3.79	91.04	16.61	1.27	85.90	0.65	
N.M. Ready	S5	7.53	83.88%	0.00%	83.88%	0.00%	8.83%	0.003	11.00	6.3	6.32	0.19	4.45	0.81	0.05	110.05	0.65	
HD Dye	S5	7.11	90.46%	0.00%	90.46%	0.00%	6.92%	0.009	11.00	6.4	6.43	0.62	14.99	2.74	0.10	142.99	0.65	
WB Color	S5	8.90	69.19%	59.14%	10.05%	63.45%	24.98%	0.008	11.00	2.4	0.89	0.08	2.00	0.36	0.39	5.51	0.65	
Color NM*	S9	9.11	61.52%	0.00%	61.52%	0.00%	21.36%	0.008	11.00	5.6	5.60	0.47	11.30	2.06	0.45	0.65	0.65	
Color M	S9	7.65	82.11%	0.00%	82.11%	0.00%	11.25%	0.002	11.00	6.3	6.28	0.16	3.88	0.71	0.05	0.65	0.65	
N.M. Ready	S9	7.53	83.88%	0.00%	83.88%	0.00%	8.83%	0.000	11.00	6.3	6.32	0.01	0.24	0.04	0.00	110.05	0.65	
HD Dye	S9	7.11	90.46%	0.00%	90.46%	0.00%	6.92%	0.000	11.00	6.4	6.43	0.02	0.57	0.10	0.00	142.99	0.65	
WB Color	S9	8.90	69.19%	59.14%	10.05%	63.45%	24.98%	0.000	11.00	2.4	0.89	0.00	0.09	0.02	0.02	5.51	0.65	
Reflow acrylic*	S6	7.62	77.60%	0.00%	77.60%	0.00%	18.33%	0.303	11.00	5.9	5.91	19.71	473.00	86.32	8.72	49.63	0.65	
Total Solvent Usage*	All Booths	6.65	100.00%	0.00%	100.00%	0.00%	0.00%	0.081	11.00	6.7	6.65	5.91	141.74	25.87	0.00	N/A	1	
Total Potential Emissions (worst-case):												41.84	1004.14	183.26	46.33			

Potential Emissions (controlled):

Control Efficiency:	VOC	PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	0.00%	98.00%	41.84	1004.14	183.26	0.93

*These coatings represent worst-case VOC and PM emissions for each booth. The sum of VOC and PM emissions from these booths is equal to 183.26 ton VOC per year and 46.33 tons PM per year.
(1) Pursuant to CP-177-3462-00054, issued September 27, 1994, spray booths 1,2,3,4,5, and 9 shall use HVLP spray guns and booth 6 shall use an electrostatic precipitators to comply with 326 IAC 8-1-6 (BACT).

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 hrs/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) * Transfer Efficiency
- Total = Sum of Worst Coating for each booth + Sum of all solvents used
- Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

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

Company Name: J.M Hutton and Co., Inc.
Address City IN Zip: 1117 North E St., Richmond, IN 47375
Title V: T177-6466-00083
Reviewer: JM/EVP
Date: Januray 26, 1998

Potential Emissions (uncontrolled):																		
Material (as applied)	Booth	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 (1)	
METAL LINE																		
WB Primer*	E1	10.07	58.60%	48.09%	10.51%	58.16%	27.68%	0.221	5.00	2.5	1.06	1.17	28.07	5.12	7.06	5.88	0.65	
H.H Primer*	E6	7.84	79.46%	0.00%	79.46%	0.00%	11.15%	0.085	5.00	6.2	6.23	2.64	63.47	11.58	1.05	85.96	0.65	
Color NM	E2	9.11	61.52%	0.00%	61.52%	0.00%	21.36%	0.047	5.00	5.6	5.60	1.33	31.88	5.82	1.27	40.37	0.65	
Color M*	E2	7.65	82.11%	0.00%	82.11%	0.00%	11.25%	0.158	5.00	6.3	6.28	4.96	119.10	21.73	1.66	85.90	0.65	
N.M. Ready	E2	7.53	83.88%	0.00%	83.88%	0.00%	8.83%	0.007	5.00	6.3	6.32	0.21	5.15	0.94	0.06	110.05	0.65	
HD Dye	E2	7.11	90.46%	0.00%	90.46%	0.00%	6.92%	0.019	5.00	6.4	6.43	0.61	14.66	2.68	0.10	142.99	0.65	
Reflow Acrylic*	E3	7.62	77.60%	0.00%	77.60%	0.00%	18.33%	0.467	5.00	5.9	5.91	13.81	331.37	60.48	6.11	49.63	0.65	
Thinner*	E2,E3,E6	6.65	100.00%	0.00%	100.00%	0.00%	0.00%	0.555	5.00	6.7	6.65	18.47	443.25	80.89	0.00	N/A	1	
WOOD LINE																		
Stain*	E7	8.19	85.25%	0.00%	85.25%	0.00%	30.73%	0.149	2.00	7.0	6.98	2.08	49.94	9.11	0.55	34.95	0.65	
Sealer*	E7	7.57	78.54%	0.00%	78.54%	0.00%	16.34%	0.497	2.00	5.9	5.95	5.91	141.84	25.88	2.48	55.98	0.65	
Hot Lacquer*	E8	7.71	77.23%	0.00%	77.23%	0.00%	18.25%	0.022	2.00	6.0	5.95	0.26	6.17	1.13	0.12	50.20	0.65	
Velvet Lacquer*	E8	7.42	78.83%	0.00%	78.83%	0.00%	15.99%	0.086	2.00	5.8	5.85	1.01	24.23	4.42	0.42	56.28	0.65	
Hot Lacquer*	E9	7.71	77.23%	0.00%	77.23%	0.00%	18.25%	0.022	2.00	6.0	5.95	0.26	6.17	1.13	0.00	32.63	1	
Velvet Lacquer*	E9	7.42	78.83%	0.00%	78.83%	0.00%	15.99%	0.086	2.00	5.8	5.85	1.01	24.23	4.42	0.00	36.58	1	
Thinner*	E7,E8,E9	6.20	100.00%	0.00%	100.00%	0.00%	0.00%	0.081	2.00	6.2	6.20	1.00	24.02	4.38	0.00	N/A	1	
Total Uncontrolled Potential (worst-case) Emissions:												52.58	1261.84	230.29	19.44			
Potential Emissions (controlled):																		
											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
											VOC	PM						
Total Controlled Potential (worst-case) Emissions:											0.00%	98.00%	52.58	1261.84	230.29	0.39		

*These coatings represent worst-case VOC and PM emissions and were used to determine total potential VOC emissions.

The potential VOC emissions for touch-up booth E-4 are not shown because the emissions have been accounted for in Booths E1, E2, and E3.

Pursuant to CP177-3461-00053, the four (4) booths identified as Booths 1,2,3,and 4 shall utilize high volume-low pressure (HVLP) application systems with dry filters for particulate control. Shading operations in Booth 3 may utilize air atomization equipmer

Water based primer shall be used for all primer applications. These regulations are necessary to meet the requiremens of 326 IAC 8-1-6 (BACT).

Booths 7 and 8 utilize HVLP application systems with dry filters for particulate control. Booth 9 utilizes a hand-wipe application process.

Booth 6 will be reviewed under Enhanced New Source Review and limited liability has been requested.

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) * Transfer Efficiency

Total = Sum of Potential Emissions from Worst Coatings for each booth + Sum of all solvents used

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: J.M Hutton and Co., Inc.
Address City IN Zip: 1117 North E St., Richmond, IN 47375
Title V: T177-6466-00083
Reviewer: JM/EVP
Date: Januray 26, 1998

Material	Booth	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Ethylene Gly.	Weight % MIBK	Weight % MEK	Weight % Di. Ptha	Toluene (ton/yr)	Xylene (ton/yr)	Ethylene Glycol (ton/yr)	MIBK (ton/yr)	MEK (ton/yr)	Di. Ptha (ton/yr)
METAL LINE																
WB Primer*	E1	10.07	0.221	5.00	0.00%	0.00%	9.00%	0.00%	0.00%	0.00%	0.00	0.00	4.39	0.00	0.00	0.00
H.H Primer*	E6	7.84	0.085	5.00	20.00%	11.00%	3.00%	16.00%	16.00%	0.00%	2.92	1.60	0.44	2.33	2.33	0.00
Color NM	E2	9.11	0.047	5.00	36.00%	2.00%	5.00%	0.00%	5.00%	0.00%	3.40	0.19	0.47	0.00	0.47	0.00
Color M*	E2	7.65	0.158	5.00	51.00%	0.00%	0.00%	0.00%	0.00%	0.00%	13.50	0.00	0.00	0.00	0.00	0.00
N.M. Ready	E2	7.53	0.007	5.00	31.00%	1.00%	3.00%	0.00%	13.00%	0.00%	0.35	0.01	0.03	0.00	0.15	0.00
HD Dye	E2	7.11	0.019	5.00	19.00%	0.00%	0.00%	0.00%	23.00%	0.00%	0.56	0.00	0.00	0.00	0.68	0.00
Reflow Acrylic*	E3	7.62	0.467	5.00	32.00%	2.00%	10.00%	0.00%	10.00%	0.00%	24.94	1.56	7.79	0.00	7.79	0.00
Thinner*	E2,E3,E6	6.65	0.555	5.00	30.00%	0.00%	20.00%	0.00%	20.00%	0.00%	24.27	0.00	16.18	0.00	16.18	0.00
WOOD LINE																
Stain*	E7	8.19	0.149	2.00	3.00%	1.00%	10.00%	0.00%	0.00%	0.00%	0.32	0.11	1.07	0.00	0.00	0.00
Sealer*	E7	7.57	0.497	2.00	43.00%	0.00%	5.00%	0.00%	6.00%	0.00%	14.17	0.00	1.65	0.00	1.98	0.00
Hot Lacquer*	E8	7.71	0.022	2.00	28.00%	0.00%	0.00%	0.00%	4.00%	3.00%	0.41	0.00	0.00	0.00	0.06	0.00
Velvet Lacquer*	E8	7.42	0.086	2.00	21.00%	0.00%	0.00%	0.00%	9.00%	1.00%	1.18	0.00	0.00	0.00	0.50	0.00
Hot Lacquer*	E8	7.71	0.022	2.00	28.00%	0.00%	0.00%	0.00%	4.00%	3.00%	0.41	0.00	0.00	0.00	0.06	0.00
Velvet Lacquer*	E8	7.42	0.086	2.00	21.00%	0.00%	0.00%	0.00%	9.00%	1.00%	1.18	0.00	0.00	0.00	0.50	0.00
Thinner*	E7,E8,E9	6.20	0.081	2.00	0.00%	8.00%	0.00%	2.00%	0.00%	0.00%	0.00	0.35	0.00	0.09	0.00	0.00

Total Potential Emissions 83.29 3.62 31.51 2.42 29.41 0.01

METHODOLOGY

* The following coatings represent worst-case HAP emissions from each booth and the sum of their emissions is represented under Total HAPs.

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

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

Company Name: J.M. Hutton and Co., Inc.
Address City IN Zip: 1117 North E St., Richmond, Indiana 47375
 1501 South 8th St., Richmond, Indiana 47375
Title V: T177-6466-00083
Reviewer: Jeremy Magliaro/EVP
Date: January 26, 1998

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

7.5

65.7

Heat Input Capacity includes:

one (1) natural gas-fired boiler rated at 6.0 MMBtu/hr and located at the South 8th Street Plant (see insignificant activities)

one (1) natural gas boiler rated at 1.5 MMBtu/hr and located at the North E Street plant (see insignificant activities)

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.8	21.0
Potential Emission in tons/yr	0.39	0.39	0.02	3.29	0.19	0.69

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 = 15, 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
Wood Fired Combustion**

Company Name: J.M. Hutton and Co., Inc.
Address City IN Zip: 1117 North E St., Richmond, Indiana 47375
 1501 South 8th St., Richmond, Indiana 47375
Title V: T177-6466-00083
Reviewer: Jeremy Magliaro/EVP
Date: January 26, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput tons wood-burned/hour
1.2	0.095

Heat Input Capacity includes:
 one (1) wood-fired (spreader stoker) boiler rated at 1.2 MMBtu/hr (SCC #1-01-009-03)

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/tons wood burned	8.8	6.5	0.0	0.7	0.2	1.9
Potential Emission in tons/yr	3.67	2.70	0.01	0.28	0.09	0.79

Methodology:

MMBtu = 1,000,000 Btu

Wood average heating value: 1lb wood = 6,300 Btu (mechanical engineering handbook)

The wood burned in the boiler is kiln dried prior to burning, and has a moisture content below 10%.

potential wood burned (tons/hr) = (1.2 x 10E6 Btu/hr) x (1 lb/6300 Btu) x 1 ton/2000 lb

Emission Factors from AP 42, Chapter 1.6, Tables 1.6-1, 1.6-2, 1.6-3, 1.6-7 , SCC #1-01-009-03 (spreader stoker-combustion)

Emission (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton wood burned) x 8760 hrs/yr x 1 ton/2000 lb