

**CONSTRUCTION PERMIT  
OFFICE OF AIR MANAGEMENT**

**Aurora Casket Company, Inc.  
202 Conwell Street  
Aurora, Indiana 47001**

is hereby authorized to construct

One (1) surface coating spray booth, identified as EU-12, for applying a topcoat to metal burial caskets, equipped with electrostatic air atomized spray guns and dry filters as overspray controls, capacity: 27 metal caskets per hour.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP 029-9454-00011	
Issued by:  Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

### **Construction Conditions**

#### General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
2. That this permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.
4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

#### First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
  - (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
  - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
  - (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
  - (e) Pursuant to 326 IAC 2-7-4(a)(1)(A), the Permittee shall apply for a Title V operating permit within twelve (12) months after the source becomes subject to Title V. This 12-month period starts at the postmarked submission date of the Affidavit of Construction. If the construction is completed in phases, the 12-month period starts at the postmarked submission date of the Affidavit of Construction that triggers the Title V applicability. The operation permit

issued shall contain as a minimum the conditions in the Operation Conditions section of this permit.

7. When the facility is constructed and placed into operation the following operation conditions shall be met:

### **Operation Conditions**

#### General Operation Conditions

1. The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
2. The permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

#### Preventive Maintenance Plan

3. Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:
  - (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
  - (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
  - (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

#### Transfer of Permit

4. Pursuant to 326 IAC 2-1-6 (Transfer of Permits):
  - (a) In the event that ownership of this surface coating spray booth is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
  - (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
  - (c) The OAM shall reserve the right to issue a new permit.

#### Permit Revocation

5. Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

6. Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM or other public official

Opacity Limitations

7. Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:
- (a) visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings.
  - (b) visible emissions shall not exceed 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

Fugitive Dust Emissions

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

Particulate Matter

9. Pursuant to 326 IAC 6-3-2(c) (Process Operations):
- (a) The dry filters for particulate matter overspray control shall be in operation at all times when the surface coating spray booth (EU-12) is in operation.
  - (b) The PM from the surface coating spray booth (EU-12) 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:

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

- (c) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while the booth is in operation.
- (d) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
- (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Volatile Organic Compounds

- 10. (a) The amount of volatile organic compounds (VOC), including clean up solvent, delivered to the applicators at the surface coating spray booth, identified as EU-12, minus the VOC solvent shipped out shall be limited to 24.0 tons of per year, based on a 12-month rolling total.
- (b) Compliance with the VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Hazardous Air Pollutants

- 11. (a) The amount of any individual hazardous air pollutant (HAP), including clean up solvent, delivered to the applicators at the surface coating spray booth, identified as EU-12, minus the HAPs solvent shipped out shall be limited to 9.0 tons of per year, based on a 12-month rolling total.
- (b) The amount of any combination of hazardous air pollutants (HAPs), including clean up solvent, delivered to the applicators at the surface coating spray booth, identified as EU-12, minus the HAPs solvent shipped shall be limited to 24.0 tons per year, based on a 12-month rolling total.
- (c) Compliance with the HAPs usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping Requirements

- 12. (a) To document compliance with Condition nos. 10 and 11, 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 established in Condition nos. 10 and 11.
  - (1) The amount and VOC and HAP 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 and HAP content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC and HAP usage for each month; and
  - (6) The weight of VOC and HAPs emitted for each compliance period.
- (b) To document compliance with Condition no. 9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
  - (c) These records shall be kept for at least the past 36-month period and made available upon request to the Office of Air Management (OAM).

Reporting Requirements

13. (a) A quarterly summary of the information to document compliance with Condition no. 10 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

within 30 days after the end of the quarter being reported in the format attached. These reports shall include the VOC and individual HAP usage at the surface coating spray booth (EU-12).

- (b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:
  - (i) Delivered by U.S. mail and postmarked on or before the date it is due; or
  - (ii) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (e) The first report shall cover the period commencing the postmarked submission date of the Affidavit of Construction.

Open Burning

14. That 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.

Emergency Reduction Plans

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within 180 calendar days from the issuance date of this permit.

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

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate level. [326 IAC 1-5-3]

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

**Quarterly Report Form**

Source Name: Aurora Casket Company, Inc.  
Source Address: 202 Conwell Street, Aurora, Indiana 47001  
Mailing Address: 202 Conwell Street, Aurora, Indiana 47001  
CP No.: 029-9454-00011  
Facility: One (1) surface coating spray booth (EU-12)  
Parameter: VOC usage  
Limit: 24.0 tons per year, based on a 12-month rolling total

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**

**Quarterly Report Form**

Source Name: Aurora Casket Company, Inc.  
Source Address: 202 Conwell Street, Aurora, Indiana 47001  
Mailing Address: 202 Conwell Street, Aurora, Indiana 47001  
CP No.: 029-9454-00011  
Facility: One (1) surface coating spray booth (EU-12)  
Parameter: Individual HAP usage  
Limit: 9.0 tons per year, based on a 12-month rolling total

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**

**Quarterly Report Form**

Source Name: Aurora Casket Company, Inc.  
Source Address: 202 Conwell Street, Aurora, Indiana 47001  
Mailing Address: 202 Conwell Street, Aurora, Indiana 47001  
CP No.: 029-9454-00011  
Facility: One (1) surface coating spray booth (EU-12)  
Parameter: Total HAP usage  
Limit: 24.0 tons per year, based on a 12-month rolling total

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: \_\_\_\_\_

Mail to: Permit Administration & Development Section  
Office of Air Management  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Aurora Casket Company, Inc.  
202 Conwell Street  
Aurora, IN 47001

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

- 1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
- 2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_ Aurora Casket Company, Inc. .  
(Title) (Company Name)
- 3. By virtue of my position with Aurora Casket Company, Inc., I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of Aurora Casket Company, Inc.
- 4. I hereby certify that Aurora Casket Company, Inc., 202 Conwell Street, Aurora, Indiana 47001, has constructed the surface coating spray booth facility in conformity with the requirements and intent of the Construction Permit application received by the Office of Air Management on February 9, 1998 and as permitted pursuant to **Construction Permit No. CP 029-9454, Plant ID No. 029-00011** issued on \_\_\_\_\_.
- 5. Additional TYPEOFFACILITY were constructed/substituted as described in the attachment to this document and were not made in accordance with the Construction Permit. (Delete this statement if it does not apply.)
- 6. I hereby certify that Aurora Casket Company, Inc. is now subject to the Title V program and will submit a Title V operating permit application within twelve (12) months from the postmarked submission date of this Affidavit of Construction.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS  
COUNTY OF \_\_\_\_\_)

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_.

My Commission expires: \_\_\_\_\_.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for New Construction and Operation

#### Source Background And Description

Source Name: Aurora Casket Company, Inc.  
 Source Location: 202 Conwell Street, Aurora, Indiana 47001  
 County: Dearborn  
 SIC Code: 3995  
 Permit No.: CP 029-9454-00011  
 Permit Reviewer: CarrieAnn Ortolani

The Office of Air Management (OAM) has reviewed an application from Aurora Casket Company, Inc. relating to the construction and operation of a surface coating spray booth at an existing source for applying a topcoat to metal burial caskets, consisting of the following equipment:

One (1) surface coating spray booth, identified as EU-12, for applying a topcoat to metal burial caskets, equipped with electrostatic air atomized spray guns and dry filters as over-spray controls, capacity: 27 metal caskets per hour.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
EU-12	surface coating spray booth	35.0	3.33	1,600	68

#### Enforcement Issue

There are no Enforcement actions pending.

#### Recommendation

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

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

An administratively complete application for the purposes of this review was received on February 9, 1998.

#### Emissions Calculations

See pages 1 and 2 of 2 of Appendix A: Emissions Calculations for detailed calculations.

#### Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

<b>Pollutant</b>	<b>Allowable Emissions (tons/yr)</b>	<b>Potential Emissions (tons/yr)</b>
Particulate Matter (PM)	15.0	15.0
Particulate Matter (PM <sub>10</sub> )	15.0	15.0
Sulfur Dioxide (SO <sub>2</sub> )	0.00	0.00
Volatile Organic Compounds (VOC)	66.3	66.3
Carbon Monoxide (CO)	0.00	0.00
Nitrogen Oxides (NO <sub>x</sub> )	0.00	0.00
Single Hazardous Air Pollutant (HAP)	25.7	25.7
Combination of HAPs	33.1	33.1

- (a) Allowable emissions are determined from the applicability of 326 IAC 6-3. Since the emission limitation based on 326 IAC 6-3 is a variable hourly limit, a constant yearly limit can not be computed. The allowable PM emissions indicated in this table are also the potential PM emissions.
- (b) The allowable emissions based on the rules cited are the same as the potential emissions, therefore, the allowable emissions are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.
- (d) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

**County Attainment Status**

The source is located in Dearborn County.

<b>Pollutant</b>	<b>Status</b>
TSP	attainment
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Dearborn County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Dearborn County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (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 PM emissions are not counted toward determination of PSD applicability.

### Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	52.4
PM <sub>10</sub>	52.4
SO <sub>2</sub>	0.00
VOC	99.0
CO	1.90
NO <sub>x</sub>	7.70

- (a) This existing source is not a major source because the source has been issued a FESOP (F 029-7698-00011) on September 18, 1997 with an administrative amendment (AAF 029-9146) on December 9, 1997 with a limit of 99 tons per year. This source is not one of the 28 listed source categories.
- (b) These emissions were based on the FESOP (F 029-7698-00011) issued to the source on September 18, 1997.

### Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO <sub>x</sub> (tons/yr)
Proposed Modification	0.109	0.109	0.00	24.0	0.00	0.00
PSD Threshold Level	250	250	250	250	250	250

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) This modification to a FESOP stationary source will change the status of the stationary source because the emissions increase is not limited to less than the FESOP significant levels.

**Part 70 Permit Determination**

326 IAC 2-8 (FESOP) and 326 IAC 2-7 (Part 70 Permit Program)

- (a) This existing source was issued a (F 029-7698-00011) on September 18, 1997 with an administrative amendment (AAF 029-9146) on December 9, 1997.
- (b) This modification to this FESOP stationary source will change the status of the stationary source because the emissions increase is not limited to less than the FESOP significant levels. The source will become a major Title V source.
- (c) In order to comply with the requirements of 326 IAC 2-7-4(a)(1)(A), this existing source will apply for a Part 70 Operating Permit within twelve (12) months after the source becomes subject to Part 70 (326 IAC 2-7). This 12-month period starts at the postmarked submission date of the Affidavit of Construction.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 63) applicable to this source.

**State Rule Applicability**

326 IAC 2-1-3.4 (New Source Air Toxics Control)

Since this modification has the potential to emit more than 10 tons per year of any individual HAP and 25 tons per year of any combination of HAPs, 326 IAC 2-1-3.4 could be applicable. The source has agreed to limit individual HAP emissions from the surface coating spray booth (EU-12) to 9.0 tons per year, based on a 12-month rolling total and any combination of HAP emissions to 24.0 tons per year, based on a 12-month rolling total. Therefore, the requirements of 326 IAC 2-1-3.4 do not apply. Although the HAP emissions from this modification are limited to no more than 9.0 tons per year of any individual HAP and 24.0 tons per year of any combination of HAPs, the source will be a Title V major source because this modification will result in the HAP emissions from the entire

source exceeding these levels.

#### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) overspray from the surface coating spray booth will 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:

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

Compliance will be demonstrated by operating dry filters at all times when the surface coating spray booth is in operation.

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

Since this modification has the potential to emit more than 25 tons per year of VOC, 326 IAC 8-1-6 could be applicable. The source has agreed to limit VOC emissions from the surface coating spray booth (EU-12) to 24.0 tons per year, based on a 12-month rolling total. Therefore, the requirements of 326 IAC 8-1-6 do not apply, and this source will not be required to install Best Available Control Technology (BACT).

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

Since this facility is used for the coating of metal burial caskets, and the source is not located in or adjacent to a county that is nonattainment for ozone, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) do not apply.

### **Air Toxic Emissions**

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

- (a) This modification 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.
- (b) See attached spreadsheets for detailed air toxic calculations.

### **Conclusion**

The operation of this surface coating spray booth will be subject to the conditions of the attached proposed **Construction Permit No. CP 029-9454-00011**.

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

Addendum to the  
Technical Support Document for New Construction and Operation

Source Name: Aurora Casket Company, Inc.  
Source Location: 202 Conwell Street, Aurora, Indiana 47001  
County: Dearborn  
Construction Permit No.: 029-9454-00011  
SIC Code: 3995  
Permit Reviewer: CarrieAnn Ortolani

On April 7, 1998, the Office of Air Management (OAM) had a notice published in the Journal Press, Lawrence, Indiana, stating that Aurora Casket Company had applied for a construction permit to construct and operate a surface coating spray booth facility with dry filters as overspray control. 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.

The following statement on page 1 of 5 of the Technical Support Document (TSD) to this proposed permit is false, "There are no Enforcement actions pending."

During January and February of 1998, Aurora Casket Company violated Operation Condition D.1.2 of their Federally Enforceable State Operating Permit (FESOP) (F 029-9454-00011), issued September 18, 1997, by exceeding its limit for the use of any single hazardous air pollutant (HAP) and by exceeding its limit for any combination of HAPs. Enforcement actions are pending. There is no change to the conditions of this permit.

**ENHANCED NEW SOURCE REVIEW and  
FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Aurora Casket Company, Inc.  
202 Conwell Street  
Aurora, Indiana 47001**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F029-7698-00011	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: September 18, 1997
First Administrative Amendment: AAF 029-9146	Pages Affected: 4, 5, 11, 18, 21, 24, 28
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 9, 1997
Operation Permit No.: ENSR/SMF 029-9454-00011	Pages Affected: 4, 21, 24, 28
Issued by: Paul Dubenetzky, Branch Chief 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), and presented in the permit application.

### A.1 General Information

The Permittee owns and operates a burial casket manufacturing company.

Responsible Official: William Barrott  
Source Address: 202 Conwell Street, Aurora, Indiana 47001  
Mailing Address: 202 Conwell Street, Aurora, Indiana 47001  
SIC Code: 3995  
County Location: Dearborn  
County Status: Sulfur Dioxide is unclassifiable  
Attainment for all other criteria pollutants  
Source Status: Synthetic Minor Source, FESOP Program

### A.2 Emission Units and Pollution Control Summary

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

- (1) Four (4) surface coating spray booths identified as primer booth, color booth, shade booth, and topcoat booth with the capacity to do 27 burial casket an hour. The primer, color, and shade booths each use one (1) airless spray gun and the topcoat booth uses one (1) air atomization spray gun. Each booth is equipped with a water wash to control particulate matter emissions.
- (2) One (1) surface coating spray booth identified as repair booth, with the capacity to do 27 burial caskets an hour. The booth uses one (1) airless spray gun and is equipped with a dry filter to control particulate matter emissions
- (3) One (1) surface coating spray booth identified as the hardware flowcoat booth, with the capacity to do 100 handles and fixtures an hour. The booth uses flowcoating and is equipped with a dry filter to condition intake air, with no controls for particulate matter emissions
- (4) One (1) surface coating spray booth identified as hardware topcoat booth, with the capacity to do 100 handles and fixtures an hour. The booth uses one (1) electrostatic disk and is equipped with a dry filter to control particulate matter emissions
- (5) One (1) surface coating spray booth identified as hardware color booth, with the capacity to do 100 handles and fixtures an hour. The booth uses one (1) airless spray gun and is equipped with a dry filter to control particulate matter emissions
- (6) One (1) natural gas fired boiler with heat input capacity of 12.554 million British thermal units per hour
- (7) One (1) open top vapor degreaser
- (8) Woodworking operations with a cyclone controlling particulate emissions
- (9) Four (4) MIG welding stations consuming 1.3 pounds per hour of carbon steel wire
- (10) One (1) portable shot blasting unit which uses wet blasting method at all times.
- (11) One (1) surface coating spray booth, identified as EU-12, for applying a topcoat to metal burial caskets, equipped with electrostatic air atomized spray guns and dry filters as overspray controls, capacity: 27 metal caskets per hour.

### A.3 Insignificant Activities

This stationary source also includes 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 million (10,000,000) Btu per hour

## SECTION D.1 FACILITY OPERATION CONDITIONS

Four (4) surface coating spray booths identified as primer booth, color booth, shade booth, and topcoat booth with the capacity to do 27 burial casket an hour. The primer, color, and shade booths each use one (1) airless spray gun and the topcoat booth uses one (1) air atomization spray gun. Each booth is equipped with a water wash to control particulate matter emissions

One (1) surface coating spray booth identified as repair booth, with the capacity to do 27 burial caskets an hour. The booth uses one (1) airless spray gun and is equipped with a dry filter to control particulate matter emissions

One (1) surface coating spray booth identified as the hardware flowcoat booth, with the capacity to do 100 handles and fixtures an hour. The booth uses flowcoating and is equipped with a dry filter to condition intake air, with no controls for particulate matter emissions

One (1) surface coating spray booth identified as hardware topcoat booth, with the capacity to do 100 handles and fixtures an hour. The booth uses one (1) electrostatic disk and is equipped with a dry filter to control particulate matter emissions

One (1) surface coating spray booth identified as hardware color booth, with the capacity to do 100 handles and fixtures an hour. The booth uses one (1) airless spray gun and is equipped with a dry filter to control particulate matter emissions

One (1) open top vapor degreaser

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

#### D.1.1 Volatile Organic Compound

That pursuant to 326 IAC 2-8-4 the amount of VOCs delivered to the applicators of the equipment contained in this section and the equipment contained in Section D.3 plus the amount of VOCs used for clean-up plus the amount used in the vapor degreaser shall be limited to 8.14 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.2 Hazardous Air Pollutants

The amount of any single HAP delivered to the applicators of the equipment contained in this section and the equipment contained in Section D.3 plus the amount of any single HAP used for clean-up plus the amount used in the vapor degreaser shall be limited to 0.78 tons per month. The amount of any combination of HAPs delivered to the applicators of the equipment contained in this section and the equipment contained in Section D.3 plus the amount of any combination of HAPs used for clean-up plus the amount used in the vapor degreaser shall be limited to 1.96 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.3 Particulate Matter Overspray

The dry filters and water washes for particulate matter overspray control shall be in operation at all times when the paint booths are in operation. Pursuant to 326 IAC 6-3-2 (c), the particulate matter from the paint booths 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:

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

Aurora Casket Company, Inc.  
Aurora, Indiana  
Permit Reviewer:MES

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D.1.4 Halogenated Solvent Cleaning Operations

This degreaser is subject to the Halogenated Solvent Cleaning NESHAP, 40 CFR Parts 9 and 63, and to 326 IAC 20-6.

**SECTION D.3**

**FACILITY CONDITIONS**

One (1) surface coating spray booth, identified as EU-12, for applying a topcoat to metal burial caskets, equipped with electrostatic air atomized spray guns and dry filters as overspray controls, capacity: 27 metal caskets per hour.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

**Construction Conditions [326 IAC 2-1-3.2]**

**General Construction Conditions**

D.3.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

**Effective Date of the Permit**

D.3.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.3.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.3.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

**First Time Operation Permit**

D.3.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to:

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

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously,

a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

### Operation Conditions

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

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D.3.6 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the surface coating spray booth (EU-12) 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.3.7 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

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(a) Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the amount of volatile organic compounds (VOC) delivered to the applicators at the surface coating spray booth, identified as EU-12, shall be limited to 2.0 tons of VOC per month, equivalent to 24.0 tons of VOC per year.

(b) Pursuant to 326 IAC 2-8-4 the amount of VOCs delivered to the applicators of the equipment contained in this section shall be limited as indicated in Condition D.1.1. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.3.8 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

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The amount of any single HAP and any combination of HAPs delivered to the applicators of the equipment contained in this section shall be limited as indicated in Condition D.1.2. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.3.9 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

D.3.10 Testing Requirements [326 IAC 2-8-5(1)]

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

D.3.11 Volatile Organic Compounds

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Compliance with the VOC usage limitations contained in Condition D.3.7 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer.

However, 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.3.12 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when the surface coating spray booth (EU-12) is in operation.

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

**D.3.13 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. 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 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 2-8-4(3)] [326 IAC 2-8-16]**

**D.3.14 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.3.7 and D.3.8, 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 and HAP usage limits established in Conditions D.1.1 and D.1.2 and referenced in Conditions D.3.7 and D.3.8 and the VOC usage limit established in D.3.7.
  - (1) The amount and VOC and HAP 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 and HAP content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;

- (5) The total VOC and HAP usage for each month; and
  - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.3.6 and D.3.12, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
  - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.7 and D.3.8 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**

**FESOP Quarterly Report**

Source Name: Aurora Casket Company, Inc.  
Source Address: 202 Conwell Street, Aurora, Indiana 47001  
Mailing Address: 202 Conwell Street, Aurora, Indiana 47001  
FESOP No.: F 029-7698-00011  
Facility: Nine (9) paint booths and one (1) open top vapor degreaser  
Parameter: VOC and HAP usage  
Limit: 0.78 tons per month of any single HAP, 1.96 tons per month of any combination of HAPs, and 8.14 tons per month of VOC

YEAR: \_\_\_\_\_

Month	VOC Usage (tons)	Worst Case Single HAP Usage (tons)	Combination HAP Usage (tons)

- 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**

**FESOP Quarterly Report**

Source Name: Aurora Casket Company, Inc.  
Source Address: 202 Conwell Street, Aurora, Indiana 47001  
Mailing Address: 202 Conwell Street, Aurora, Indiana 47001  
FESOP No.: F 029-7698-00011  
Facility: One (1) surface coating spray booth (EU-12)  
Parameter: VOC usage  
Limit: 2.0 tons per month

YEAR: \_\_\_\_\_

Month	VOC Usage (tons)

- 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: \_\_\_\_\_

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

**Company Name:** Aurora Casket Company, Inc.  
**Plant Location:** 202 Conwell Street, Aurora IN 47001  
**County:** Dearborn  
**CP:** 029-9454  
**Plt ID#:** 029-00011  
**Permit Reviewer:** CarrieAnn Ortolani  
**Date:** February 9, 1998

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
<b>EU-12</b>																
Clear Topcoat Bake Enamel	8.33	47.9%	0.0%	47.9%	0.0%	55.00%	0.11700	27.000	3.99	3.99	12.6	303	55.2	15.0	7.25	75%
Aromatic 100	7.30	100.0%	0.0%	100.0%	0.0%	0.00%	0.01290	27.000	7.30	7.30	2.54	61.0	11.1	0.00	n/a	75%

**State Potential Emissions**

**Add worst case coating to all solvents**

<b>15.1</b>	<b>364</b>	<b>66.3</b>	<b>15.0</b>
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Control Technology Emissions (Combustion)		Emission Factors										Emissions			
Type	Number	Capacity MMBtu/hr	Gas usage MMCF/yr	PM lb/MMCF	PM10 lb/MMCF	SO2 lb/MMCF	NOx lb/MMCF	VOC lb/MMCF	CO lb/MMCF	PM tons/yr	PM10 tons/yr	SO2 tons/yr	NOx tons/yr	VOC tons/yr	CO tons/yr
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0	0.0	0.0	0.0	0.0	0.0	0.0
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>			<b>0.0</b>							<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
										<b>Control Efficiency</b>					
										<b>VOC</b>	<b>PM</b>	<b>Controlled VOC pounds per hour</b>	<b>Controlled VOC pounds per day</b>	<b>Controlled VOC tons/yr</b>	<b>Controlled Particulate tons/yr</b>
										<b>0</b>	<b>0.98</b>				

Controlled Emissions due to Surface Coating Operations and Controls

<b>15.1</b>	<b>364</b>	<b>66.3</b>	<b>0.300</b>
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**METHODOLOGY**

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

HAP Emission Calculations

Company Name: Aurora Casket Company, Inc.  
 Plant Location: 202 Conwell Street, Aurora IN 47001  
 County: Dearborn  
 CP: 029-9454  
 Plt ID#: 029-00011  
 Permit Reviewer: CarrieAnn Ortolani  
 Date: February 9, 1998

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % MIBK	Weight % Form-aldehyde	Weight % Ethyl benzene	Weight % Cumene	Weight % Xylene	MIBK Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Ethyl benzene Emissions (tons/yr)	Cumene Emissions (tons/yr)	Xylene Emissions (tons/yr)	Total Emissions (tons/yr)
<b>EU-12</b>														
Clear Topcoat Bake Enamel	8.33	0.1170	27.00	1.00%	0.22%	5.00%	0.00%	22.00%	1.15	0.256	5.76	0.00	25.4	<b>32.5</b>
Aromatic 100	7.33	0.0129	27.00	0.00%	0.00%	0.00%	2.00%	3.00%	0.00	0.00	0.00	0.224	0.335	<b>0.559</b>

Total State Potential Emissions

<b>TOTALS:</b>	<b>(tons/yr):</b>	<b>1.15</b>	<b>0.256</b>	<b>5.76</b>	<b>0.224</b>	<b>25.7</b>	<b>33.1</b>
	<b>(lb/hr):</b>	<b>0.263</b>	<b>0.058</b>	<b>1.32</b>	<b>0.051</b>	<b>5.87</b>	<b>7.56</b>
	<b>(g/sec):</b>	<b>0.033</b>	<b>0.007</b>	<b>0.166</b>	<b>0.006</b>	<b>0.740</b>	<b>0.953</b>

**METHODOLOGY**

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