NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a Minor Source Operating Permit (MSOP)
For Continental Mirrored Graphics, Inc. in Elkhart County

Significant Permit Revision No.: 039-41697-00613

The Indiana Department of Environmental Management (IDEM) has received an application from Continental Mirrored Graphics, Inc., located at 1838 Middlebury Road, Elkhart, IN, for a significant revision of its MSOP issued on July 18, 2011. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Continental Mirrored Graphics, Inc. to make certain changes at its existing source. Continental Mirrored Graphics, Inc. has applied to add an unpermitted sand blaster in the screen printing operation.

The applicant intends to operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the sand blaster, identified as JGS 1800, has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM’s preliminary findings are available at:

Elkhart Public Library
300 South Second Street
Elkhart, IN 46514

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.
You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 039-41697-00613 in all correspondence.

**Comments should be sent to:**

Daniel W. Pell  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IG-CN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Daniel W. Pell or (317) 234-8532  
Or dial directly: (317) 234-8532  
Fax: (317) 232-6749 attn: Daniel W. Pell  
E-mail: dpell@idem.in.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

**What will happen after IDEM makes a decision?**

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

If you have any questions, please contact Daniel W. Pell of my staff at the above address.

[Signature]

Heath Hartley, Section Chief  
Permits Branch  
Office of Air Quality
Mr. Chris Robinson  
Continental Mirrored Graphics, Inc.  
1838 Middlebury Street  
Elkhart, IN 46516  

Re: 039-41697-00613  
Significant Revision to  
M039-30231-00613

Dear Mr. Robinson:

Continental Mirrored Graphics, Inc. was issued a Minor Source Operating Permit (MSOP) Renewal No. M039-30231-00613 on July 18, 2011 for a stationary graphic arts operation located at 1838 Middlebury Street, Elkhart, IN. On July 22, 2019, the Office of Air Quality (OAQ) received an application from the source requesting to add an unpermitted sand blaster in the screen printing operation to the operating permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following is a list of the existing unpermitted emission unit:

(1) One (1) sandblast unit, identified as JGS 1800, constructed in 2018, with a maximum flow rate of 48.0 pounds of sand abrasive per hour per nozzle (3 total nozzles) and a maximum material removal rate of 842 pounds per hour of plate glass per hour, with particulate emissions controlled by a totally enclosed dust collector, exhausting inside the building. The blast media is continuously re-used.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the Significant Permit Revision into the permit. All other conditions of the permit shall remain unchanged and in effect.

Please find attached the entire MSOP as revised.

A copy of the permit is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/). A copy of the permit is also available via IDEM’s Virtual File Cabinet (VFC). Please go to: [http://www.in.gov/idem/](http://www.in.gov/idem/) and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, please contact Daniel W. Pell, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-8532 or (800) 451-6027, and ask for Daniel W. Pell or (317) 234-8532.

Sincerely,

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality


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

Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Continental Mirrored Graphics
1838 Middlebury Road
Elkhart, Indiana 46516

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

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

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

<table>
<thead>
<tr>
<th>Operation Permit No.: M039-30231-00613</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master Agency Interest ID: 36159</td>
</tr>
</tbody>
</table>

| Issued by: / Original Signed by:       |
| Alfred C. Dumaul, Ph. D., Section Chief|
| Permits Branch                         |
| Office of Air Quality                  |

| Issuance Date: July 18, 2011           |
| Expiration Date: July 18, 2021         |

Administrative Amendment No.: M039-35951-00613, issued on June 29, 2015

| Significant Permit Revision No.: 039-41697-00613 |

| Issued by:                                  |
| Heath Hartley, Section Chief               |
| Permits Branch                             |
| Office of Air Quality                      |

| Issuance Date:                              |
| Expiration Date: July 18, 2021              |
TABLE OF CONTENTS

SECTION A

SOURCE SUMMARY ......................................................................................................... 4

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]
A.2 Emission Units and Pollution Control Equipment Summary

SECTION B

GENERAL CONDITIONS ................................................................................................... 6

B.1 Definitions [326 IAC 2-1.1-1]
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability
B.5 Severability
B.6 Property Rights or Exclusive Privilege
B.7 Duty to Provide Information
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]
B.9 Preventive Maintenance Plan [326 IAC 1-6-3]
B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]
B.12 Permit Renewal [326 IAC 2-6.1-7]
B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]
B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]
B.17 Annual Fee Payment [326 IAC 2-1.1-7]
B.18 Credible Evidence [326 IAC 1-1-6]

SECTION C

SOURCE OPERATION CONDITIONS ............................................................................. 11

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].......................................... 11
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
C.8 Performance Testing [326 IAC 3-6]
C.9 Compliance Requirements [326 IAC 2-1.1-11]
C.10 Compliance Monitoring [326 IAC 2 1.1 11]
C.11 Instrument Specifications [326 IAC 2 1.1 11]

Corrective Actions and Response Steps........................................................................ 14
C.12 Response to Excursions or Exceedances
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)].............................. 15
C.14 Malfunctions Report [326 IAC 1-6-2]
C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]
C.16 General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS .............................................................. 17

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)].......................................... 17
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)] .............................................. 17
D.1.3 Volatile Organic Compounds (VOC)

Record Keeping and Reporting Requirements [326 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)] ..... 17
D.1.4 Record Keeping Requirements
D.1.5 Reporting Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS .......................................................... 19

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)] ..................................................... 19
D.2.1 Particulate [326 IAC 6-2-4]
D.2.2 Particulate Emission Limitations [326 IAC 6-3-2]
D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements [326 IAC 2-6.1-5(a)(2)] .............................................. 20
D.2.4 Particulate Control
D.2.5 Testing Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)] .................................................. 20
D.2.6 Parametric Monitoring
D.2.7 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)] ........................................ 21
D.2.8 Record Keeping Requirements
SECTION A  SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary graphic arts operation.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>1838 Middlebury Road, Elkhart, Indiana 46516</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(574) 522-7983</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2759 &amp; 3211</td>
</tr>
<tr>
<td>County Location:</td>
<td>Elkhart</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Minor Source Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

A.2  Emission Units and Pollution Control Equipment Summary

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

(a) One (1) screen printed glass line, with a maximum throughput of 6.229 square feet of glass per hour, utilizing silk screening to transfer inks to mirror surface, constructed in 2004, and exhausting to stacks D3 and D4.

(b) One (1) natural gas-fired air make-up unit, identified as A1, with a maximum heat input of 0.15 MMBtu per hour, and exhausting to stack A1.

(c) Ten (10) natural gas-fired DTH tube heaters, with a maximum heat input of 0.15 MMBtu per hour, each, and exhausting to stacks B6 through B10.

(d) Thirteen (13) natural gas-fired DBS tube heaters, with a maximum heat input of 0.075 MMBtu per hour, each, and exhausting to stacks B3 through B5.

(e) Three (3) natural gas-fired hot water heaters, with a maximum heat input of 0.919 MMBtu per hour, each, and exhausting to stack B1.

(f) One (1) natural gas-fired hot water heater, with a maximum heat input of 0.1999 MMBtu per hour, and exhausting to stack B11.

(g) Two (2) natural gas-fired paint cure ovens, identified as D1 and D2, with a maximum heat input of 1.34 MMBtu per hour, each, constructed in 2006, and exhausting to stacks D1 and D2.

(h) Two (2) natural gas-fired print cure ovens, identified as D3 and D4, with a maximum heat input of 1.34 MMBtu per hour, each, constructed in 2004, and exhausting to stacks D3 and D4.
(i) One (1) mirror production line, identified as D1, with a maximum throughput of 3886 square feet of glass per hour, utilizing flow-coating, constructed in 2006, and exhausting to stacks D1 and D2.

(j) One (1) sandblast unit, identified as JGS 1800, constructed in 2018, with a maximum flow rate of 48.0 pounds of sand abrasive per hour per nozzle (3 total nozzles) and a maximum material removal rate of 842 pounds per hour of plate glass per hour, with particulate emissions controlled by a totally enclosed dust collector, exhausting inside the building. The blast media is continuously re-used.
SECTION B  GENERAL CONDITIONS

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

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

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

(a) This permit, M039-30231-00613, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

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

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

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

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

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

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

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

(a) All terms and conditions of permits established prior to M039-30231-00613 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee’s premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

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

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

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

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

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.
C.6 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days
prior to the actual test date.

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]
The commissioner may require stack testing, monitoring, or reporting at any time to assure
compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any
monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved
by the commissioner or the U.S. EPA.

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

C.10 Compliance Monitoring [326 IAC 2 1.1 11]
Compliance with applicable requirements shall be documented as required by this permit. The
Permittee shall be responsible for installing any necessary equipment and initiating any required
monitoring related to that equipment. All monitoring and record keeping requirements not already
legally required shall be implemented when operation begins.
C.11 Instrument Specifications [326 IAC 2 1.1 11]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

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

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

(a) Records of all required monitoring data, reports, and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

   Indiana Department of Environmental Management
   Compliance and Enforcement Branch, Office of Air Quality
(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

(i) One (1) mirror production line, identified as D1, with a maximum throughput of 3886 square feet of glass per hour, utilizing flow-coating, constructed in 2006, and exhausting to stacks D1 and D2.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC content delivered to the one (1) mirror production line, identified as D1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

Compliance with this limit shall limit the VOC emissions from this line to less than 25 tons per twelve (12) consecutive month period and render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the one (1) mirror production line, identified as D1. Section B - Preventative Maintenance Plan contains this Permittee's obligation with regard to the preventative maintenance plan required by this condition.

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

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, 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 limit established in Condition D.1.1.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent used less water on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The 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 VOC emitted for each compliance period.

(b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).
## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- **(e)** Three (3) natural gas-fired hot water heaters, with a maximum heat input of 0.919 MMBtu per hour, each, and exhausting to stack B1.

- **(f)** One (1) natural gas-fired hot water heater, with a maximum heat input of 0.1999 MMBtu per hour, and exhausting to stack B11.

- **(j)** One (1) sandblast unit, identified as JGS 1800, constructed in 2018, with a maximum flow rate of 48.0 pounds of sand abrasive per hour per nozzle (3 total nozzles) and a maximum material removal rate of 842 pounds per hour of plate glass per hour, with particulate emissions controlled by a totally enclosed dust collector, exhausting inside the building. The blast media is continuously re-used.

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

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

#### D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), particulate emissions for the sawdust wood waste-fired hot water heater, identified as EP 7, shall be limited to the following:

\[
Pt = \frac{1.09}{Q^{0.26}}
\]

Where:

- **Pt** = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
- **Q** = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

For a total source maximum operating capacity rating (Q) less than 10 MMBtu/hr, particulate emissions (Pt) shall not exceed 0.6 pound per MMBtu of heat input. For Q greater than or equal to 10,000 MMBtu/hr, Pt shall not exceed 0.1 pound per MMBtu of heat input.

#### D.2.2 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the sandblast unit, identified as JGS 1800, shall not exceed 2.55 pounds per hour when operating at a process weight rate of 986 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

\[
E = (4.10) \times (P^{0.67})
\]

Where

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

#### D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.4 Particulate Control

(a) In order to comply with Condition D.2.2, the dust collector for particulate control shall be in operation and control emissions from the sandblast unit, identified as JGS 1800, at all times the sandblast unit, is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collector for sandblast unit, identified as JGS 1800, at least once per day when the associated sandblast unit is in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.2.6 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.
Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of pressure drop across the baghouse. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required by this condition.
Indiana Department of Environmental Management  
Office of Air Quality  
Compliance and Enforcement Branch

Quarterly Report

Source Name: Continental Mirrored Graphics  
Source Address: 1838 Middlebury Road, Elkhart, Indiana 46516  
MSOP Permit No.: M039-30231-00613  
Source: mirror production line, identified as D1  
Pollutant: VOC input  
Limit: The input of VOC shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month

Year: ____________

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<th>Month</th>
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<td>This Month</td>
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Form Completed by: ____________________________

Title / Position: ____________________________

Date: ____________________________

Phone: ____________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Continental Mirrored Graphics</th>
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<tbody>
<tr>
<td>Address:</td>
<td>1838 Middlebury Road</td>
</tr>
<tr>
<td>City:</td>
<td>Elkhart, Indiana 46516</td>
</tr>
<tr>
<td>Phone #:</td>
<td>(574) 522-7983</td>
</tr>
<tr>
<td>MSOP #:</td>
<td>M039-30231-00613</td>
</tr>
</tbody>
</table>

I hereby certify that Continental Mirrored Graphics is:

☐ still in operation.
☐ no longer in operation.

I hereby certify that Continental Mirrored Graphics is:

☐ in compliance with the requirements of MSOP M039-30231-00613.
☐ not in compliance with the requirements of MSOP M039-30231-00613.

Authorized Individual (typed):

Title:

Signature:

Date:

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

Noncompliance:

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


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

THIS INCIDENT MEETS THE DEFINITION OF “MALFUNCTION” AS LISTED ON REVERSE SIDE Y N

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

COMPANY: ______________________________ PHONE NO. ( ) __________________

LOCATION: (CITY AND COUNTY) ___________________________________________

PERMIT NO. ________________ AFZ PLANT ID: ________________ AFZ POINT ID: ________________ INSPECTION: ________________

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: __________________________________________

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _______________________________________

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _______________________________________

MEASURES TAKEN TO MINIMIZE EMISSIONS: ___________________________________________________________

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _________________________________

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _________________________________

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _______________________

INTERIM CONTROL MEASURES: (IF APPLICABLE) _______________________________________________________

MALFUNCTION REPORTED BY: ______________________________ TITLE: ______________________________

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: ______________________________ DATE: ______________________________ TIME: ______________________________

*SEE PAGE 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 “Malfunction” definition

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

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

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

________________________________________________________________________
________________________________________________________________________
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Minor Source Operating Permit (MSOP) Renewal

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Continental Mirrored Graphics, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>1838 Middlebury Road, Elkhart, IN 46516</td>
</tr>
<tr>
<td>County:</td>
<td>Elkhart</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2759 (Commercial Printing, Not Elsewhere Classified)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>M039-30231-00613</td>
</tr>
<tr>
<td>Operation Permit Issuance Date:</td>
<td>July 18, 2011</td>
</tr>
<tr>
<td>Significant Permit Revision No.:</td>
<td>039-41697-00613</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Daniel W. Pell</td>
</tr>
</tbody>
</table>

Existing Approvals

The source was issued MSOP Renewal No. M039-30231-00613 on July 18, 2011. The source has since received the following approval:

(a) MSOP AA No. 039-35951-00613, issued on June 29, 2015.

County Attainment Status

The source is located in Elkhart County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 5, 2005, for the annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Cannot be classified or better than national standards.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011.</td>
</tr>
</tbody>
</table>

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

*These documents are incorporated by reference. Copies referenced in this section may be obtained from the Government Printing Office, 732 North Capitol Street NW, Washington, D.C. 20401 or are available for review and copying at the Indiana Department of Environmental Management, Office of Legal Counsel, Indiana Government Center North, Thirteenth Floor, 100 North Senate Avenue, Indianapolis, Indiana 46204.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(b) PM$_{2.5}$
Elkhart County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NO$_x$ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

---

**Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

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**Greenhouse Gas (GHG) Emissions**

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

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

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**Source Status - Existing Source**

This table reflects the unrestricted potential emissions of the source prior to the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.
### Source-Wide Emissions Prior to Revision (tons/year)

<table>
<thead>
<tr>
<th></th>
<th>PM$^{1}$</th>
<th>PM$_{10}^{1}$</th>
<th>PM$_{2.5}^{1,2}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^{3}$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire</td>
<td>0.09</td>
<td>0.36</td>
<td>0.36</td>
<td>0.03</td>
<td>4.79</td>
<td>78.63</td>
<td>4.03</td>
<td>6.94</td>
<td>9.62</td>
</tr>
<tr>
<td>Source Excluding Fugitives*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(Toluene)</td>
<td></td>
</tr>
<tr>
<td>Title V Major Source</td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>&lt; 100</td>
<td>&lt; 10</td>
</tr>
<tr>
<td>Thresholds</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>&lt; 100</td>
<td>&lt; 25</td>
<td>&lt; 25</td>
</tr>
</tbody>
</table>

$^1$ Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

$^2$ PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^3$ Single highest source-wide HAP.

* Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of MSOP AA No. 039-35951-00613, issued on June 29, 2015.

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Continental Mirrored Graphics, Inc. on July 22, 2019, relating to the addition of an unpermitted sand blaster in the screen printing operation to the operating permit.

The following emission units were constructed and/or operated without a permit:

(a) One (1) sandblast unit, identified as JGS 1800, constructed in 2018, with a maximum flow rate of 48.0 pounds of sand abrasive per hour per nozzle (3 total nozzles) and a maximum material removal rate of 842 pounds per hour of plate glass per hour, with particulate emissions controlled by a totally enclosed dust collector, exhausting inside the building. The blast media is continuously re-used.

### Enforcement Issues

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

### Emission Calculations

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

### Permit Level Determination – MSOP Significant Permit Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control...
equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM¹</th>
<th>PM₁₀</th>
<th>PM₂.₅¹</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP²</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sandblast Unit, JGS 1800</td>
<td>25.86</td>
<td>18.10</td>
<td>18.10</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Unit:</td>
<td>25.86</td>
<td>18.10</td>
<td>18.10</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

¹PM₂.₅ listed is direct PM₂.₅.
²Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves the construction of new emission units with a potential to emit greater than or equal to twenty-five (25) tons per year of the following pollutant: PM.

### PTE of the Entire Source After Issuance of the MSOP Revision

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

<table>
<thead>
<tr>
<th>Source-Wide Emissions after Issuance (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM¹</td>
</tr>
<tr>
<td>------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
</tr>
<tr>
<td>MSOP Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a “regulated air pollutant.”
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP.
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the uncontrolled/unlimited potential to emit criteria pollutants and HAPs from the entire source will continue to be less than the Title V major source threshold levels. Therefore, the source is subject
to the provisions of 326 IAC 2-6.1 (MSOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed revision.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

Due to this revision, state rule applicability has been reviewed as follows:

326 IAC 2-6.1 (MSOP)
MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Revision section of this document.

326 IAC 2-2 (PSD)
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP Revision section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The new emission unit will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

<table>
<thead>
<tr>
<th>State Rule Applicability – Individual Facilities</th>
</tr>
</thead>
</table>

**Sandblast Unit, JGS 1800**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Sandblast Unit, JGS 1800, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Sandblast Unit, JGS 1800 shall not exceed 2.55 pounds per hour when operating at a process weight rate of 986 lbs per hour (842 lbs per hr + (3 x 48 lbs per hr) = 986 lbs per hr. 986 lbs per hour = 0.493 tons per hour). The pound per hour limitation was calculated with the following equation:

\[ E = \left(4.10 \times P^{0.67}\right) \]

Interpolation 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:

\[ E = \left(4.10 \times P^{0.67}\right) \]

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

Based on calculations, the dust collector shall be in operation at all times to comply with this limit.

<table>
<thead>
<tr>
<th>Compliance Determination and Monitoring Requirements</th>
</tr>
</thead>
</table>

The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

<table>
<thead>
<tr>
<th>Emission Unit / Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sandblast Unit, JGS 1800 / Dust Collector</td>
<td>Pressure Drop Monitoring</td>
<td>Daily</td>
<td>Within normal range of 3 to 6 inches of water, unless a different upper or lower value is established in the most recent compliant stack test</td>
</tr>
</tbody>
</table>

This monitoring condition is necessary because the dust collector for the Sandblast Unit, JGS 1800 must operate properly to assure compliance with 326 IAC 6-3-2.
Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

(1) The new sandblast unit JGS 1800, was added to Section A.2.

(2) The new sandblast unit JGS 1800 was added to Section D.2. Also the requirements of 326 IAC 6-3-2 were added to Section D.2 for the new sandblast unit JGS 1800. In addition, a Preventative Maintenance Plan, Compliance Determination Requirements, Compliance Monitoring Requirements, and Record Keeping and Reporting Requirements were added to Section D.2 for the new sandblast unit JGS 1800.

Additional Changes

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

(1) The Master Agency Interest ID: 36159, was added to the signature block.

The permit has been revised as follows:

<table>
<thead>
<tr>
<th>Operation Permit No.: M039-30231-00613</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master Agency Interest ID: 36159</td>
</tr>
</tbody>
</table>

Issued by: / Original Signed by:  
Alfred C. Dumaul, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality  
Issuance Date: July 18, 2011  
Expiration Date: July 18, 2021

A.2 Emission Units and Pollution Control Equipment Summary

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

(j) One (1) sandblast unit, identified as JGS 1800, constructed in 2018, with a maximum flow rate of 48.0 pounds of sand abrasive per hour per nozzle (3 total nozzles) and a maximum material removal rate of 842 pounds per hour of plate glass per hour, with particulate emissions controlled by a totally enclosed dust collector, exhausting inside the building. The blast media is continuously re-used.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:</th>
</tr>
</thead>
<tbody>
<tr>
<td>*****</td>
</tr>
<tr>
<td>(j) One (1) sandblast unit, identified as JGS 1800, constructed in 2018, with a maximum flow rate of 48.0 pounds of sand abrasive per hour per nozzle (3 total nozzles) and a maximum material removal rate of 842 pounds per hour of plate glass per hour, with particulate emissions controlled by a totally enclosed dust collector, exhausting inside the building. The blast media is continuously re-used.</td>
</tr>
<tr>
<td>*****</td>
</tr>
</tbody>
</table>

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]
D.2.2 Particulate Emission Limitations [326 IAC 6-3-2]
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the sandblast unit, identified as JGS 1800, shall not exceed 2.55 pounds per hour when operating at a process weight rate of 986 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

\[ E = (4.10) \times (P^{0.67}) \]

Where \( E \) = rate of emission in pounds per hour; and \( P \) = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]
A Preventive Maintenance Plan is required for these facilities and any control devices. Section B Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.4 Particulate Control
(a) In order to comply with Condition D.2.2, the dust collector for particulate control shall be in operation and control emissions from the sandblast unit, identified as JGS 1800, at all times the sandblast unit is in operation.
(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Parametric Monitoring
The Permittee shall record the pressure drop across the dust collector for sandblast unit, identified as JGS 1800, at least once per day when the associated sandblast unit is in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.2.6 Broken or Failed Bag Detection
(a) For a single compartment baghouse controlling emissions from a process
operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

Bag failure can be indicated by a significant drop in the baghouse’s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of pressure drop across the baghouse. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required by this condition.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on July 22, 2019.

The operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision (SPR) No. 039-41697-00613. The staff recommends to the Commissioner that the MSOP Significant Permit Revision (SPR) be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Daniel W. Pell, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-8532 or (800) 451-6027, and ask for Daniel W. Pell or (317) 234-8532.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Screen Printed Glass Line</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>24.75</td>
<td>-</td>
<td>9.53</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.09</td>
<td>0.36</td>
<td>0.36</td>
<td>0.03</td>
<td>4.79</td>
<td>0.26</td>
<td>4.03</td>
<td>0.09</td>
</tr>
<tr>
<td>Mirror Production Line (D1)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>53.61</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Sandblast Unit JGS 1800</td>
<td>25.86</td>
<td>18.10</td>
<td>18.10</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>25.95</td>
<td>18.47</td>
<td>18.47</td>
<td>0.03</td>
<td>4.79</td>
<td>78.63</td>
<td>4.03</td>
<td>9.62</td>
</tr>
</tbody>
</table>

* PM2.5 listed is direct PM2.5

Note: In order to render the requirement of 326 IAC 8-1-6 not applicable, the VOC content delivered to the one (1) mirror production line, identified as D1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
### Appendix A: Emission Calculations
Modification PTE Summary - 41697

**Company Name:** Continental Mirrored Graphics, Inc.  
**Address City IN Zip:** 1838 Middlebury Road, Elkhart, IN 46516  
**Permit No.:** 039-41697-00613  
**Reviewer:** Daniel W. Pell

<table>
<thead>
<tr>
<th>Unpermitted Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sanblast Unit JGS 1800</td>
<td>25.86</td>
<td>18.10</td>
<td>18.10</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>25.86</strong></td>
<td><strong>18.10</strong></td>
<td><strong>18.10</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
</tr>
<tr>
<td>Significant Permit Revision Threshold</td>
<td>≥ 25</td>
<td>≥ 25</td>
<td>≥ 25</td>
<td>≥ 25</td>
<td>≥ 25</td>
<td>≥ 100</td>
<td>≥ 25</td>
<td></td>
</tr>
</tbody>
</table>

*PM2.5 listed is direct PM2.5
**Appendix A: Emissions Calculations**

**Screen Printed Glass Line**

**Company Name:** Continental Mirrored Graphics, Inc.  
**Address:** 1838 Middlebury Road, Elkhart, IN 46516  
**Permit No.:** 039-41697-00613  
**Reviewer:** Daniel W. Pell

<table>
<thead>
<tr>
<th>PRODUCT NAME</th>
<th>MAXIMUM THROUGHPUT (GAL/HR)</th>
<th>DENSITY (LBS/GAL)</th>
<th>VOC CONTENT (LBS/GAL)</th>
<th>WEIGHT % XYLENE</th>
<th>WEIGHT % METHANOL</th>
<th>WEIGHT % TOLUENE</th>
<th>WEIGHT % METHYL ISOBUTYL KETONE</th>
<th>WEIGHT % DIETHYLENE GLYCOL</th>
</tr>
</thead>
<tbody>
<tr>
<td>PURE LACQUER THINNER</td>
<td>0.377</td>
<td>7.00</td>
<td>7.00</td>
<td>0%</td>
<td>10%</td>
<td>60%</td>
<td>10%</td>
<td>0%</td>
</tr>
<tr>
<td>SIMULATED ETCH</td>
<td>0.0585</td>
<td>9.00</td>
<td>4.69</td>
<td>0%</td>
<td>1%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>EPOXY CLEAR METALLIC BASE (ADHESION PROMOTER)</td>
<td>0.00025</td>
<td>7.76</td>
<td>4.47</td>
<td>0%</td>
<td>58%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>KRINKLE TEX PART A</td>
<td>0.002</td>
<td>8.92</td>
<td>3.24</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>KRINKLE TEX PART B</td>
<td>0.0025</td>
<td>8.62</td>
<td>3.51</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>LEADED EFFECT CLEAR</td>
<td>0.035</td>
<td>9.74</td>
<td>0.64</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
</tr>
<tr>
<td>BUTYL CELLOSOLVE</td>
<td>0.224</td>
<td>7.5</td>
<td>7.5</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>MBI68 ink black</td>
<td>0.001</td>
<td>8.92</td>
<td>3.59</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Metallic Base E-6002</td>
<td>0.0045</td>
<td>9.09</td>
<td>3.53</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>MBI 29 Smooth Silver</td>
<td>0.0075</td>
<td>9.83</td>
<td>2.68</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>CS Crystal Coast -CC-006 Part B</td>
<td>0.122</td>
<td>8.9</td>
<td>3.66</td>
<td>5%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>OC-004 Part owR</td>
<td>0.131</td>
<td>8.54</td>
<td>4.04</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>2 PART EPOXY BLACK ET-6053</td>
<td>0.0025</td>
<td>8.92</td>
<td>1.66</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

**Potential to Emit (tons/yr)**

<table>
<thead>
<tr>
<th>PRODUCT NAME</th>
<th>VOC</th>
<th>XYLENE</th>
<th>METHANOL</th>
<th>TOLUENE</th>
<th>METHYL ISOBUTYL KETONE</th>
<th>DIETHYLENE GLYCOL</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>PURE LACQUER THINNER</td>
<td>11.56</td>
<td>0.00</td>
<td>1.16</td>
<td>6.94</td>
<td>1.16</td>
<td>0.00</td>
<td>9.25</td>
</tr>
<tr>
<td>SIMULATED ETCH</td>
<td>1.20</td>
<td>0.00</td>
<td>0.02</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.02</td>
</tr>
<tr>
<td>EPOXY CLEAR METALLIC BASE (ADHESION PROMOTER)</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>KRINKLE TEX PART A</td>
<td>0.03</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>KRINKLE TEX PART B</td>
<td>0.04</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>LEADED EFFECT CLEAR</td>
<td>0.10</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>BUTYL CELLOSOLVE</td>
<td>7.36</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>MBI68 ink black</td>
<td>0.02</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Metallic Base E-6002</td>
<td>0.07</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>MBI 29 Smooth Silver</td>
<td>0.09</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>CS Crystal Coast -CC-006 Part B</td>
<td>1.96</td>
<td>0.24</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.24</td>
</tr>
<tr>
<td>OC-004 Part owR</td>
<td>2.32</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>2 PART EPOXY BLACK ET-6053</td>
<td>0.02</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>24.75</strong></td>
<td><strong>0.24</strong></td>
<td><strong>1.18</strong></td>
<td><strong>6.94</strong></td>
<td><strong>1.16</strong></td>
<td><strong>0.01</strong></td>
<td><strong>9.53</strong></td>
</tr>
</tbody>
</table>

**Methodology**

Potential to Emit VOC (tons/yr) = MAXIMUM THROUGHPUT (GAL/HR) * VOC CONTENT (LBS/GAL) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit HAP (tons/yr) = MAXIMUM THROUGHPUT (GAL/HR) * DENSITY (LBS/GAL) * WEIGHT % HAP * (8760 hrs/yr) * (1 ton/2000 lbs)
Appendix A: Emissions Calculations
Natural Gas Combustion Units

Company Name: Continental Mirrored Graphics, Inc.
Address: 1838 Middlebury Road, Elkhart, IN 46516
Permit No.: 039-41697-00613
Reviewer: Daniel W. Pell

This source contains:
- One (1) air make-up unit (A1), with a heat input capacity of 0.15 MMBtu/hr.
- Ten (10) DTH tube heaters, each with a heat input capacity of 0.15 MMBtu/hr.
- Thirteen (13) DBS tube heaters, each with a heat input capacity of 0.075 MMBtu/hr.
- Three (3) hot water heaters, each with a heat input capacity of 0.919 MMBtu/hr.
- One (1) water heater, with a heat input capacity of 0.1999 MMBtu/hr.
- Two (2) paint cure ovens (D1 and D2), each with a heat input capacity of 1.34 MMBtu/hr.
- Two (2) print cure ovens (D3 and D4), each with a heat input capacity of 0.1999 MMBtu/hr.

Total Heat Input Capacity (MMBtu/hr) = 10.94
Total Potential Throughput (MMCF/yr) = 95.85

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lbs/10^6 scf)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.09</td>
</tr>
<tr>
<td>PM_{10}*</td>
<td>7.6</td>
<td>0.36</td>
</tr>
<tr>
<td>PM_{2.5}</td>
<td>7.6</td>
<td>0.36</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.03</td>
</tr>
<tr>
<td>NOx**</td>
<td>100</td>
<td>4.79</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.26</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>4.03</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM_{10} emission factor is filterable and condensable PM combined.

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

<table>
<thead>
<tr>
<th>HAPs: Organics</th>
<th>Emission Factor (lbs/10^6 scf)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
<td>1.01E-04</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>5.75E-05</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>3.59E-03</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8</td>
<td>0.09</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>1.63E-04</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs: Metals</th>
<th>Emission Factor (lbs/10^6 scf)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
<td>2.40E-05</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
<td>5.27E-05</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
<td>6.71E-05</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.9E-04</td>
<td>1.82E-05</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
<td>1.01E-04</td>
</tr>
</tbody>
</table>

Combined HAPs: 0.09

Methodology
All emission factors are based on normal firing.

- MMBtu = 1,000,000 Btu
- MMCF = 1,000,000 Cubic Feet of Gas
- 10^6 scf = MMCF
- Heating Value = 1000 MMBtu/10^6 scf
- Emission Factors are from US EPA's AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2.
- The five highest of both organic and metal HAPs emission factors (from US EPA's AP 42, Chapter 1.4, Tables 1.4-2, 1.4-3, and 1.4-4) are provided; additional HAPs emission factors are available in AP 42, Chapter 1.4.

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) * (8760 hrs/yr) * (1 MMCF/1000 MMBtu)

Potential Emissions (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lbs/10^6 scf) * (1 ton/2000 lbs)
## Appendix A: Emissions Calculations

### Mirror Production Line (D1)

**Company Name:** Continental Mirrored Graphics, Inc.  
**Address:** 1838 Middlebury Road, Elkhart, IN 46516  
**Permit No.:** 039-41697-00613  
**Reviewer:** Daniel W. Pell

### PRODUCT NAME

<table>
<thead>
<tr>
<th>PRODUCT NAME</th>
<th>MAXIMUM THROUGHPUT (GAL/HR)</th>
<th>DENSITY (LBS/GAL)</th>
<th>VOC CONTENT (LBS/GAL)</th>
<th>PTE VOC (TONS/YR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hilemn Sureguard Dark Gray Low Lead</td>
<td>2.75</td>
<td>12.11</td>
<td>3.70</td>
<td>44.57</td>
</tr>
<tr>
<td>Ethylene Glycol</td>
<td>0.275</td>
<td>7.51</td>
<td>7.51</td>
<td>9.05</td>
</tr>
<tr>
<td>Betashield 3500 Rollcoat</td>
<td>1.10</td>
<td>13.51</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>53.61</strong></td>
</tr>
</tbody>
</table>

**Notes:**

*Hilemn Sureguard Dark Gray Low Lead* contains 5% lead compounds (lead cyanamide)  
*Betashield 3500 Rollcoat* contains 4% lead compounds.

The lead compounds are metallic hazardous air pollutants (HAPs), which do not volatilize, and would otherwise be emitted as particulate matter. However, the coatings are applied via rollcoating, which has a 100% transfer efficiency. Therefore, particulate matter emissions and the metallic HAP emissions are considered negligible.

### Methodology

Potential to Emit VOC (tons/yr) = MAXIMUM THROUGHPUT (GAL/HR) * VOC CONTENT (LBS/GAL) * (8760 hrs/yr) * (1 ton/2000 lbs)  
Potential to Emit Lead Compounds (tons/yr) = MAXIMUM THROUGHPUT (GAL/HR) * DENSITY (LBS/GAL) * Weight % Lead Compounds * (8760 hrs/yr) * (1 ton/2000 lbs)
Appendix A: Emission Calculations
Abrasive Blasting - Confined

Company Name: Continental Mirrored Graphics, Inc.
Source Address: 1838 Middlebury Road, Elkhart, IN 46516
Permit No.: 039-41697-00613
Reviewer: Daniel W. Pell

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td></td>
</tr>
</tbody>
</table>

Potential to Emit Before Control

FR = Flow rate of actual abrasive (lb/hr) = 48.00 lb/hr (per nozzle)
w = fraction of time of wet blasting = 0 %
N = number of nozzles = 3
EF = PM emission factor for actual abrasive from Table 1 = 0.041 lb PM/ lb abrasive
PM10 emission factor ratio for actual abrasive from Table 1 = 0.70 lb PM10 / lb PM

Potential to Emit (before control) = EF x FR x (1 - w/200) x N

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.90</td>
<td>4.13</td>
<td>4.13</td>
</tr>
<tr>
<td>141.70</td>
<td>99.19</td>
<td>99.19</td>
</tr>
<tr>
<td>25.86</td>
<td>18.10</td>
<td>18.10</td>
</tr>
</tbody>
</table>

Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.06</td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td>1.42</td>
<td>0.99</td>
<td>0.99</td>
</tr>
<tr>
<td>0.259</td>
<td>0.181</td>
<td>0.181</td>
</tr>
</tbody>
</table>

METHODOLOGY
PM2.5 emissions assumed equal to PM10 emissions.

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))
Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]
Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
October 1, 2019

Chris Robinson
Continental Mirrored Graphics, Inc.
1838 Middlebury Rd
Elkhart, IN  46516

Re:  Public Notice
Continental Mirrored Graphics, Inc.
Permit Level:  MSOP Sig Permit Rev Minor PSD
Permit Number: 039-41697-00613

Dear Mr. Robinson:

Enclosed is a copy of your draft MSOP Significant Permit Revision Minor PSD, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Elkhart Public Library, 300 South 2nd Street in Elkhart, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Daniel W. Pell, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-8532 or dial (317) 234-8532.

Sincerely,

Theresa Weaver
Permits Branch
Office of Air Quality
October 1, 2019

To: Elkhart Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Continental Mirrored Graphics, Inc.
Permit Number: 039-41697-00613

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

October 1, 2019
Continental Mirrored Glass, Inc.
039-41697-00613

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

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

Enclosure
PN AAA Cover Letter 4/12/2019
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

October 1, 2019

A 30-day public comment period has been initiated for:

Permit Number: 039-41697-00613
Applicant Name: Continental Mirrored Glass, Inc.
Location: Elkhart, Elkhart County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.
## Mail Code 61-53

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