NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Federally Enforceable State Operating Permit (FESOP)

for Color All Body Shop, Inc. in Elkhart County

FESOP No.: F039-41752-00755

The Indiana Department of Environmental Management (IDEM) has received an application from Color All Body Shop, Inc. located at 25702 Miner Road, Elkhart, Indiana 46514, for a FESOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Color All Body Shop, Inc. to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, 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). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Elkhart Public Library
300 S. 2nd Street
Elkhart, IN 46516

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 F 039-41752-00765.

Comments should be sent to:

Paul Jump
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Paul Jump or (317) 234-6555
Or dial directly: (317) 234-6555
Fax: (317) 232-6749 attn: Paul Jump
E-mail: pjump@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 Paul Jump of my staff at the above address.

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality
Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

Color All Body Shop, Inc.
25702 Miner Road
Elkhart, Indiana 46514

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

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 FESOP under 326 IAC 2-8.

<table>
<thead>
<tr>
<th>Operation Permit No.: F039-41752-00755</th>
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<tbody>
<tr>
<td>Master Agency Interest ID: 30832</td>
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</table>

<table>
<thead>
<tr>
<th>Issued by:</th>
<th>Issuance Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heath Hartley, Section Chief</td>
<td></td>
</tr>
<tr>
<td>Permits Branch</td>
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<tr>
<td>Office of Air Quality</td>
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| Expiration Date: | |
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SECTION A  

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary stationary fiberglass caps and recreational vehicle (RV) surface coating facility.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>25702 Miner Road, Elkhart, Indiana 46514</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2800 Bryant Street, Elkhart, Indiana 46516</td>
</tr>
<tr>
<td>General Source Phone Number:</td>
<td>574-612-7211</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>7532 (Top, Body, and Upholstery Repair Shops and Paint Shops)</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>Federally Enforceable State Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD</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 Source Definition

This source consists of the following plants:

(a) Plant 1 is located at 25702 Miner Rd., Elkhart, Indiana 46514; and
(b) Plant 2 is located at 2800 Bryant Street, Elkhart, Indiana 46516.

These plants are considered one (1) source, as defined by 326 IAC 1-2-73.

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

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

25702 Miner Road

(a) Two (2) spray surface coating booth, identified as SB-1 and SB-2, constructed in 2014, with a maximum capacity at 0.14 units per hour and a maximum of 7.3 gallons per unit, each, using HVLP spray guns to apply coatings to fiberglass caps for recreational vehicles (RV), using dry filters as particulate control, and exhausting through stack SBV-1 and SBV-2, respectively.

2800 Bryant Street

(b) One (1) spray surface coating booth, identified as SB-3, constructed in 2014, permitted in 2017, with a maximum capacity at 0.14 units per hour and a maximum of 7.3 gallons per unit, using HVLP spray guns to apply coatings to fiberglass caps for recreational vehicles (RV) using dry filters as particulate control, and exhausting through stack SBV-3.
A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

25702 Miner Road

(a) Three (3) natural gas-fired air make-up units, approved in 2014 for construction, with a maximum heat input capacity of 0.20 MMBtu/hr, each.

(b) One (1) natural gas-fired forced air heater, approved in 2014 for construction, with a maximum heat input capacity of 2.50 MMBtu/hr.

(c) Paved and Unpaved roads, and parking lots with public access.

2800 Bryant Street

(d) One (1) natural gas-fired air make-up unit, constructed in 2014, permitted in 2017, with a maximum heat input capacity of 1.20 MMBtu/hr.

(e) Two (2) natural gas-fired forced air heaters, constructed in 2014, permitted in 2017, with a maximum heat input capacity of 0.25 MMBtu/hr, each.

(f) Paved roads.

A.5 FESOP Applicability [326 IAC 2-8-2]

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

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

(a) This permit, F039-41752-00755, is issued for a fixed term of five (5) 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 [326 IAC 2-8-6] [IC 13-17-12]

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 [326 IAC 2-8-4(4)]

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 [326 IAC 2-8-4(5)(D)]

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

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

(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 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

The submittal 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).
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]
IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]
(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

The PMP extension notification does not 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).

(b) 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. The PMPs and their submittal do not 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).

(c) 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.12 Emergency Provisions [326 IAC 2-8-12]
(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly
signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile 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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require 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).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

1. If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

2. If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

   A. The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

   B. Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F039-41752-00755 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

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

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application 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).

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 nine (9) months 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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

Any such application 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).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.

[326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee’s copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

B.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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

Any such application 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).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(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  Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source’s potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.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. The notifications do not 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).

(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.

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

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. The protocol submitted by the Permittee does not 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).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not 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).

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

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

(a) For new units:
   Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
   Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

   The notification which shall be submitted by the Permittee does require 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).

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.
C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(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.

The response action documents submitted pursuant to this condition do 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).
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(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. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
/DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include 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). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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) 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.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.

**Stratospheric Ozone Protection**

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

25702 Miner Road

(a) Two (2) spray surface coating booth, identified as SB-1 and SB-2, constructed in 2014, with a maximum capacity at 0.14 units per hour and a maximum of 7.3 gallons per unit, each, using HVLP spray guns to apply coatings to fiberglass caps for recreational vehicles (RV), using dry filters as particulate control, and exhausting through stack SBV-1 and SBV-2, respectively.

2800 Bryant Street

(b) One (1) spray surface coating booth, identified as SB-3, constructed in 2014, permitted in 2017, with a maximum capacity at 0.14 units per hour and a maximum of 7.3 gallons per unit, using HVLP spray guns to apply coatings to fiberglass caps for recreational vehicles (RV) using dry filters as particulate control, and exhausting through stack SBV-3.

(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 2-8-4(1)]

D.1.1 FESOP Limits: HAPs [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) The combined input of xylene from the three (3) surface coating booths (SB1, SB2, and SB3) shall be less than 9.5 tons per twelve (12) consecutive months with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the Permittee shall comply with the following:

(a) The total input of VOC, including coatings, dilution solvents and cleaning solvents, to the spray surface coating booth, identified as SB-1, shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The total input of VOC, including coatings, dilution solvents and cleaning solvents, to the spray surface coating booth, identified as SB-2, shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The total input of VOC, including coatings, dilution solvents and cleaning solvents, to the spray surface coating booth, identified as SB-3, shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
Compliance with these limits, shall limit the potential to emit of VOC from the spray surface coating booths (SB-1, SB-2, and SB-3) to less than twenty-five (25) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 8-1-6 not applicable.

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

Particulate from the spray surface coating booths, identified as SB-1, SB-2, and SB-3, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any associated 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 2-8-4(1)]

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

Compliance with the VOC usage limits contained in Condition D.1.2 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.

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

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booths stack(s) SBV-1, SBV-2, and SBV-3 while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.1.2.

(1) The VOC and HAP content of each coating material and solvent used.
(2) The amount of coating material and solvent used less water on monthly basis.
   (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
   (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month;

(4) The total VOC, single HAP, and total HAPs usage for each month.

(5) The total VOC, single HAP, and total HAPs usage for each compliance period.

(b) To document the compliance status with Condition D.1.3 and D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

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

D.1.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2(a), D.1.2(b), and D.1.2(c) 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.
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

25702 Miner Road
(a) Three (3) natural gas-fired air make-up units, approved in 2014 for construction, with a maximum heat input capacity of 0.20 MMBtu/hr, each.
(b) One (1) natural gas-fired forced air heater, approved in 2014 for construction, with a maximum heat input capacity of 2.50 MMBtu/hr.

2800 Bryant Street
(d) One (1) natural gas-fired air make-up unit, constructed in 2014, permitted in 2017, with a maximum heat input capacity of 1.20 MMBtu/hr.
(e) Two (2) natural gas-fired forced air heaters, constructed in 2014, permitted in 2017, with a maximum heat input capacity of 0.25 MMBtu/hr, each.

(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 Emissions [326 IAC 6-2-4]
Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from each of the four (4) natural gas-fired air make-up units and the three (3) natural gas-fired forced air heaters shall be limited to 0.6 pounds per MMBtu heat input.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]
A Preventive Maintenance Plan is required for these facilities and any associated control devices. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
INFORMATION DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Color All Body Shop, Inc.
Source Address: 25702 Miner Road, Elkhart, Indiana 46514
FESOP Permit No.: F039-41752-00755

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

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

Signature:
Printed Name:
Title/Position:
Date:
### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

**Source Name:** Color All Body Shop, Inc.  
**Source Address:** 25702 Miner Road, Elkhart, Indiana 46514  
**FESOP Permit No.:** F039-41752-00755

<table>
<thead>
<tr>
<th>This form consists of 2 pages</th>
<th>Page 1 of 2</th>
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| □ This is an emergency as defined in 326 IAC 2-7-1(12)  
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and  
  • The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12 |

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

| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |
If any of the following are not applicable, mark N/A

| Date/Time Emergency started: | |
| Date/Time Emergency was corrected: | |
| Was the facility being properly operated at the time of the emergency? | Y | N |
| Describe: | |
| Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOx, CO, Pb, other: | |
| Estimated amount of pollutant(s) emitted during emergency: | |
| Describe the steps taken to mitigate the problem: | |
| Describe the corrective actions/response steps taken: | |
| Describe the measures taken to minimize emissions: | |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: | |

Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
Indiana Department of Environmental Management  
Office of Air Quality  
Compliance and Enforcement Branch

FESOP Quarterly Report

Source Name: Color All Body Shop, Inc.  
Source Address: 25702 Miner Road, Elkhart, Indiana 46514  
FESOP Permit No.: F039-41752-00755  
Facility: One (1) spray surface coating booth, identified as SB-1.  
Pollutant: VOC Input  
Limit: Less than 25 tons per twelve (12) consecutive month period

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Form Completed by: ________________________________
Title / Position: ________________________________
Date: ________________________________
Phone: ________________________________
Indiana Department of Environmental Management  
Office of Air Quality  
Compliance and Enforcement Branch  

FESOP Quarterly Report

Source Name: Color All Body Shop, Inc.
Source Address: 25702 Miner Road, Elkhart, Indiana 46514
FESOP Permit No.: F039-41752-00755
Facility: One (1) spray surface coating booth, identified as SB-2.
Pollutant: VOC Input
Limit: Less than 25 tons per twelve (12) consecutive month period

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Form Completed by: _________________________________

Title / Position: _________________________________

Date: _________________________________

Phone: _________________________________
Indiana Department of Environmental Management  
Office of Air Quality  
Compliance and Enforcement Branch  

FESOP Quarterly Report

Source Name: Color All Body Shop, Inc.  
Source Address: 2800 Bryant Street, Elkhart, Indiana 46516  
FESOP Permit No.: F039-41752-00755  
Facility: One (1) spray surface coating booth, identified as SB-3.  
Pollutant: VOC Input  
Limit: Less than 25 tons per twelve (12) consecutive month period

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Form Completed by: ____________________________  
Title / Position: ____________________________  
Date: ____________________________  
Phone: ____________________________
## FESOP Quarterly Report

**Source Name:** Color All Body Shop, Inc.  
**Source Address:** 25702 Miner Road, Elkhart, Indiana 46514 and 2800 Bryant Street, Elkhart, Indiana 46516  
**FESOP Permit No.:** F039-41752-00755  
**Facility:** Three (3) spray surface coating booth, identified as SB-1, SB-2, and SB-3.  
**Parameter:** Xylenes input  
**Limit:** The combined input of Xylenes to the three (3) spray surface coating booth (SB-1, SB-2, and SB-3) shall be less than 9.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

### QUARTER: ___________________ YEAR: ___________________

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

Submitted by: ____________________________________________  
Title / Position: _________________________________________  
Signature: _____________________________________________  
Date: _________________________________________________  
Phone: _______________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Color All Body Shop, Inc.
Source Address: 25702 Miner Road, Elkhart, Indiana 46514
FESOP Permit No.: F039-41752-00755

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B – Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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Form Completed by: ____________________________

Title / Position: ____________________________

Date: ____________________________

Phone: ____________________________
Indiana Department of Environmental Management  
Office of Air Quality  

Technical Support Document (TSD) for a MSOP Transitioning to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Color All Body Shop, Inc.</th>
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<tbody>
<tr>
<td>Source Location:</td>
<td>25702 Miner Road, Elkhart, Indiana 46514</td>
</tr>
<tr>
<td></td>
<td>2800 Bryant Street, Elkhart, Indiana 46516</td>
</tr>
<tr>
<td>County:</td>
<td>Elkhart</td>
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<tr>
<td>SIC Code:</td>
<td>7532 (Top, Body, and Upholstery Repair Shops and Paint Shops)</td>
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<tr>
<td>Operation Permit No.:</td>
<td>F 039-41752-00755</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Paul Jump</td>
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On August 1, 2019, the Office of Air Quality (OAQ) received an application from Color All Body Shop, Inc. related to the transition of a MSOP to a FESOP.

Source Definition

The initial MSOP No. M039-34295-00755 included a source determination for a plant located at 25765 Pierna Dr., Elkhart, Indiana 46514, operating under plant ID No. 039-00745; and a plant located at 25702 Miner Road, Elkhart, Indiana 46514, operating under plant ID No. 039-00755. The two (2) plants were determined to be one (1) single source, as defined by 326 IAC 1-2-73. All of the equipment permitted at the 25765 Pierna Dr., Elkhart, Indiana location was to be relocated to the plant located at 25702 Miner Road, Elkhart. Upon the relocation of the equipment, the Permittee applied for and was issued Revocation No. 039-37173-00745 on May 12, 2016, revoking the source’s authority to operate under SSOA No. S039-33137-00745, for the plant located at 25765 Pierna Dr., Elkhart, Indiana 46514.

Color All Body Shop, Inc. now operates two (2) plants consisting of surface coating operations for recreational vehicles (RVs). Plant 1 is located at 25702 Miner Road, Elkhart; and Plant 2 is located at 2800 Bryant Street, Elkhart. The primary operation at these sites is surface coating of assembled RVs.

IDEM, OAQ has examined whether these plants are part of the same source. The term “source” is defined at 326 IAC 1-2-73. In order for these plants to be considered one source, they must meet all three of the following criteria:

1. the plants must be under common ownership or common control;
2. the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
3. the plants must be located on the same, contiguous or adjacent properties.

Both plants are owned and operated by Color All Body Shop, Inc. Since common ownership and common control exists, the first element of the definition of “source” is met.

The SIC Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at [http://www.osha.gov/pls/imi/sic_manual.html](http://www.osha.gov/pls/imi/sic_manual.html) on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant. Both plants have the two-digit SIC Code 75 (four-digit SIC Code 7532 Top, Body, and Upholstery Repair Shops and Paint Shops) for the Major Group 75: Automotive Repair, Services, and Parking. Since they meet the second part of the definition, it is not necessary to determine whether either plant is a support facility.

The last criterion of the definition is whether the plants are on the same, contiguous or adjacent
properties. Plant 1 and Plant 2 are located on separate properties that do not share any common boundary. Since they are not on the same or contiguous properties, IDEM, OAQ examined whether the plants are on adjacent properties.

The term “adjacent” is not defined in Indiana’s rules. IDEM’s Nonrule Policy Document Air-005 is guidance for applying the definition of “major source” in 326 IAC 2-7-1(22). Since the definition of “source” and “major source” are nearly identical, it is also helpful in defining a “source”. IDEM’s NPD Air-005 adds the following guidance:

- Properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- Properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- Other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

The U.S. EPA has a similar view on how to interpret the term “adjacent” when defining a source. Two U.S. EPA letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term “adjacent” as it is used in making major source determinations. These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis used to determine if two sources are “adjacent” going back to the preamble to the 1980 NSR program definition of “major source”. U.S. EPA’s consistent approach is that any evaluation of what is “adjacent” must relate to the guiding principal of a common sense notion of “source”.

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

(1) Are materials routinely transferred between the plants?
(2) Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
(3) Is the production process itself split in any way between the plants?

These questions focus on whether the separate sources are so interrelated that they are functioning as one plant, and whether the distance between them is small enough that it enables them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarty issued a memorandum on September 22, 2009 that confirmed U.S. EPA’s view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plants are adjacent.

The two plant properties are approximately 3.2 miles apart. RV manufacturers in the area send their assembled RVs to either plant to be painted. At least 75% of the RVs will first be painted at one plant and then driven by plant employees to the other plant for additional painting. There will also be some paint and other materials moving between the two plants. Managers and workers will travel back and forth to be actively involved in both plants on a frequent basis. Considering all these factors, IDEM, OAQ has determined that Plant 1 and Plant 2 are located on adjacent properties, and, therefore, meet the third part of the source definition.

The plants are located on adjacent properties, have the same two-digit SIC Code and have the same owner. Therefore IDEM, OAQ has determined that they are one (1) source, as defined by 326 IAC 1-2-73.

This determination was initially made under MSOP No. 039-34295-00755, issued on August 12, 2014.
Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) MSOP No. 039-34295-00755, issued on August 12, 2014; and

(b) Significant Permit Revision No. 039-38195-00755, issued on June 15, 2017.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Elkhart County.

<table>
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<tr>
<th>Pollutant</th>
<th>Designation</th>
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<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 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</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.

(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) PM₂.₅

Elkhart County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ 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 applicability and source status under Section 112 of the Clean Air Act (CAA).

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) 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.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Color All Body Shop, Inc. on August 1, 2019, relating to the operation of an existing stationary fiberglass caps and recreational vehicle (RV) surface coating facility. Color All Body Shop, Inc. was issued its first MSOP (M039-34295-00755) on August 12, 2014.

During the MSOP renewal process, the surface coating Potential to Emit (PTE) calculations were reevaluated and it was determined that the single HAP (xylene) PTE was above the MSOP level and the source would be required to take a usage limit, which would require the source to transition from a MSOP to a FESOP.

The following is a list of the emission units and pollution control device(s):

25702 Miner Road

(a) Two (2) spray surface coating booth, identified as SB-1 and SB-2, constructed in 2014, with a maximum capacity at 0.14 units per hour and a maximum of 7.3 gallons per unit, each, using HVLP spray guns to apply coatings to fiberglass caps for recreational vehicles (RV), using dry filters as particulate control, and exhausting through stack SBV-1 and SBV-2, respectively.

(b) Three (3) natural gas-fired air make-up units, constructed in 2014, with a maximum heat input capacity of 0.20 MMBtu/hr, each.

(c) One (1) natural gas-fired forced air heater, constructed in 2014, with a maximum heat input capacity of 2.50 MMBtu/hr.

(d) Paved and Unpaved roads, and parking lots with public access.

2800 Bryant Street

(e) One (1) spray surface coating booth, identified as SB-3, constructed in 2014, permitted in 2017, with a maximum capacity at 0.14 units per hour and a maximum of 7.3 gallons per unit, using HVLP spray guns to apply coatings to fiberglass caps for recreational vehicles (RV) using dry filters as particulate control, and exhausting through stack SBV-3.
(f) One (1) natural gas-fired air make-up unit, constructed in 2014, permitted in 2017, with a maximum heat input capacity of 1.20 MMBtu/hr.

(g) Two (2) natural gas-fired forced air heaters, constructed in 2014, permitted in 2017, with a maximum heat input capacity of 0.25 MMBtu/hr, each.

(h) Paved roads.

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

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

**Permit Level Determination – FESOP**

This table reflects the unrestricted potential emissions of the source. 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>Unrestricted Source-Wide Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$^1$</td>
</tr>
<tr>
<td>-------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives$^*$</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</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: Xylene

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

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all criteria pollutants is less than one hundred (100) tons per year.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit HAP emissions to less than the Title V major source threshold levels. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. 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>Source-Wide Emissions After Issuance (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMₐ</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
</tr>
<tr>
<td>Title V Major Source 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: Xylene
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take HAP limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD), 326 IAC 2-8 (FESOP), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing stationary source is minor under Title V (326 IAC 2-7) because the potential to emit criteria pollutants and HAPs from the entire source is less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

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

**Federal Rule Applicability Determination**

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations 40 CFR 60, Subpart MM and 326 IAC 12, are not included in the permit for this source because this source does not operate an automobile or light-duty assembly plant.
(b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart III and 326 IAC 20-85 are not included in the permit for this source, since this source is not a major source, is not located at a major source, nor is it part of a major source of emissions of HAPs.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP and 326 IAC 20-81 are not included in the permit for this source, since this source is not a major source, is not located at a major source, nor is it part of a major source of emissions of HAPs.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH are not included in the permit for this source, since the source does not perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates and the source does not spray apply any coatings that contain the target HAP, as defined in §63.11180. If circumstances change such that the source intend to spray apply coatings containing the target HAP, the source must submit the initial notification required by 63.11175 and comply with the requirements of this subpart. The requirements of 40 CFR 63, Subpart HHHHHH were previously included the permit, and are being removed in this permit.

Note: The source petitioned the Administrator (US EPA Region 5) for an exemption from this subpart and successfully demonstrate, to the satisfaction of the Administrator, that the source does not spray apply any coatings that contain the target HAP, as defined in §63.11180. The source must keep the exemption letter, dated July 5, 2016, on file for review.

(d) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

**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 limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

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**State Rule Applicability - Entire Source**

State rule applicability for this source has been reviewed as follows:

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**

PSD, and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of this source 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 2-6 (Emission Reporting)**

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, LaPorte, or Lawrenceburg Township, Dearborn County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants)

FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

FESOP HAP Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) The combined input of xylene from the three (3) surface coating booths (SB1, SB2, and SB3) shall be less than 9.5 tons per 12 consecutive months with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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.

State Rule Applicability – Individual Facilities

State rule applicability for this source has been reviewed as follows:

Spray Surface Coating Booths (SB-1, SB-2, and SB-3)
326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(d), particulate emissions shall be controlled by a dry filter, waterwash, or an equivalent control device. The control device shall be operated in accordance with manufacturer's specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The Spray Surface Coating Booths, identified as SB-1, SB-2, and SB-3, were constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the units are not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the units to less than twenty-five (25) tons per twelve (12) consecutive month period, for each unit, in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the units are not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, Permittee shall comply with the following:

1. The total input of VOC, including coatings, dilution solvents and cleaning solvents, to SB-1 shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

2. The total input of VOC, including coatings, dilution solvents and cleaning solvents, to SB-2 shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

3. The total input of VOC, including coatings, dilution solvents and cleaning solvents, to SB-3 shall be less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

Pursuant to 326 IAC 8-2-2(b), the requirements of 326 IAC 8-2-2 are not applicable to the surface coating booths (SB-1, SB-2 and SB-3), since the source is not considered an automotive or light duty truck assembly plant.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)

Pursuant to 326 IAC 8-2-1(a), 326 IAC 8-2-9(a), and 326 IAC 8-2-9(b) the facility is not subject to the requirements of 326 IAC 8-2-9 because the source does not perform metal surface coating of:

1. Large and small farm machinery;
2. Small household appliances;
3. Office equipment;
4. Commercial and industrial machinery and equipment; and/or
5. Any other industrial category that coats metal parts or products under the Standard Industrial Classification Code of major groups #33 through #39.

The source performs the surface coating of fiberglass caps under the SIC of major group #75. Therefore the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 8-10 (Automobile Refinishing)

Pursuant to 326 IAC 8-10-1(2)(B), the requirements of 326 IAC 8-10 are not applicable to the surface coating booths (SB-1, SB-2 and SB-3), since the surface coating booths (SB-1, SB-2 and SB-3) do not refinish motor vehicles, motor vehicle parts, motor vehicle components, or mobile equipment, as defined in 326 IAC 8-10-2(35).

Three (3) natural gas-fired forced air heaters and four (4) natural gas-fired air make-up unit

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

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

Where:

- \( Pt \) = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).
- \( Q \) = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility’s permit application, except when some lower capacity is contained in the facility’s operation permit; in which case, the capacity specified in the operation.

Pursuant to 326 IAC 6-2-4(a), for \( Q \) less than 10 MMBtu/hr, \( Pt \) shall not exceed 0.6 lb/MMBtu.

![Table of Indirect Heating Units Which Began Operation After September 21, 1983](image)

<table>
<thead>
<tr>
<th>Facility</th>
<th>Construction Date</th>
<th>Operating Capacity (MMBtu/hr)</th>
<th>Q (MMBtu/hr)</th>
<th>Calculated Pt (lb/MMBtu)</th>
<th>Particulate Limitation, Pt (lb/MMBtu)</th>
<th>PM PTE based on AP-42 (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Miner Rd. NG-Fired Air Make-Up Unit</td>
<td>2014</td>
<td>0.20</td>
<td>4.8</td>
<td>0.72</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Miner Rd. NG-Fired Air Make-Up Unit</td>
<td>2014</td>
<td>0.20</td>
<td>4.8</td>
<td>0.72</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Miner Rd. NG-Fired Air Make-Up Unit</td>
<td>2014</td>
<td>0.20</td>
<td>4.8</td>
<td>0.72</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Miner Rd. NG-Fired Forced Air Heater</td>
<td>2014</td>
<td>2.50</td>
<td>4.8</td>
<td>0.72</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Bryant St. NG-Fired Air Make-Up Unit</td>
<td>2014</td>
<td>1.2</td>
<td>4.8</td>
<td>0.72</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Bryant St. NG-Fired Forced Air Heater</td>
<td>2014</td>
<td>0.25</td>
<td>4.8</td>
<td>0.72</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Bryant St. NG-Fired Forced Air Heater</td>
<td>2014</td>
<td>0.25</td>
<td>4.8</td>
<td>0.72</td>
<td>0.6</td>
<td>0.002</td>
</tr>
</tbody>
</table>

Where: \( Q \) = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.

Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed.
326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The three (3) natural gas-fired forced air heaters and four (4) air make-up units at this source are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, these units were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)
The requirements of 326 IAC 9-1 do not apply to these units, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The requirements of 326 IAC 10-3 do not apply to these units, since this unit is not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

### Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this source are as follows:

1. Pursuant to 326 IAC 6-3-2(d), particulate from the spray surface coating booths, identified as SB-1, SB-2, and SB-3, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

2. Compliance with the VOC and HAP usage limit 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.

(b) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Emission Unit/ID</th>
<th>Control</th>
<th>Operating Parameter</th>
<th>Monitoring Frequency</th>
<th>Range</th>
<th>Excursions and Exceedances</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface coating operations from Plant 1 and Plant 2</td>
<td>Dry Filters</td>
<td>Filter Checks</td>
<td>Daily</td>
<td>Normal-Abnormal</td>
<td>Response Steps</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Observations of the Overspray</td>
<td>Weekly</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Observations of the Stack Exhuasts</td>
<td>Monthly</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the dry filters for PM control for the surface coating booths must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).
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 August 1, 2019.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No. 039-41752-00755. The staff recommends to the Commissioner that the FESOP be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Paul Jump, 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) 234-6555 or (800) 451-6027, and ask for Paul Jump or (317) 234-6555.

(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/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
## Emission Summary

**Company Name:** Color All Body Shop, Inc.  
**Source Address:** 25702 Miner Rd, Elkhart, Indiana 46514  
**Permit Number:** F039-41752-00755  
**Permit Reviewer:** Paul Jump

<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>
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<tr>
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<td>0.04</td>
<td>0.16</td>
<td>0.16</td>
<td>1.24E-02</td>
<td>2.06</td>
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<td>6.97</td>
<td>6.97</td>
<td>1.24E-02</td>
<td>2.06</td>
<td>83.56</td>
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* PM2.5 listed is direct PM2.5

## Uncontrolled Potential to Emit (tons/yr)

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<th>NOx</th>
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<th>CO</th>
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<tr>
<td>Natural Gas Combustion</td>
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<td>0.16</td>
<td>0.16</td>
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<td>2.06</td>
<td>0.11</td>
<td>1.73</td>
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<tr>
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<td>6.97</td>
<td>1.24E-02</td>
<td>2.06</td>
<td>83.56</td>
<td>1.73</td>
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* PM2.5 listed is direct PM2.5

## Potential to Emit after Issuance (tons/yr)

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<th>NOx</th>
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<td>2.06</td>
<td>83.56</td>
<td>1.73</td>
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* PM2.5 listed is direct PM2.5
### Appendix A: Emission Calculations

#### PTE Summary

**Company Name:** Color All Body Shop, Inc.  
**Source Address:** 25702 Miner Rd, Elkhart, Indiana 46514  
**Permit Number:** F039-41752-00755  
**Permit Reviewer:** Paul Jump

#### HAPs / Emission Units

<table>
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<tr>
<th>HAPs / Emission Units</th>
<th>Surface Coating Booth</th>
<th>Surface Coating Booth</th>
<th>Surface Coating Booth</th>
<th>NG Combustion</th>
<th>Total per HAP</th>
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<td>SB1</td>
<td>SB2</td>
<td>SB3</td>
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<tr>
<td>Methanol</td>
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<tr>
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**Note:** The shaded cells indicate where limits are included.

### Potential to Emit After Issuance of HAPs (tons/yr)

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<th>Surface Coating Booth</th>
<th>Surface Coating Booth</th>
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<th>Total per HAP</th>
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<td>SB3</td>
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<tr>
<td>Lead (Pb)</td>
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<td>Nickel (Ni)</td>
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<td>9.50</td>
<td>9.50</td>
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</tbody>
</table>

**Note:** The shaded cells indicate where limits are included.

**Limited HAPs**  
- 9.50  
**Nonlimited Combined Total HAPs**  
- 15.43  
**Source-wide Total HAPs**  
- 5.93  
**Combined Total HAPs**  
- 20.49  
**Worst Case Single HAP**  
- 14.56
Appendix A: Emissions Calculations

VOC and Particulate

From Surface Coating Operations

Three (3) Paint Booths, identified as SB1 - SB3

Company Name: Color All Body Shop, Inc.

Source Address: 25792 Minor Rd. Elkhart, Indiana 46514

Permit Number: F939-41752-00735

Reviewer: Paul Jump

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lbs/gal)</th>
<th>Weight % Volatile (water, VOC, and exempt compounds)*</th>
<th>Weight % Water and exempt compounds*</th>
<th>Weight % VOC</th>
<th>Volume % solids</th>
<th>Maximum Material Usage (gal/unit)</th>
<th>Maximum Capacity (units/hour)</th>
<th>Formula Pounds VOC per gallon coating less water and exempt compounds</th>
<th>Pounds VOC per gallon coating</th>
<th>PTE of VOC (lbs/day)</th>
<th>PTE of VOC (tons/year)</th>
<th>Uncontrolled PTE of PM10/PM2.5 (tons/year)</th>
<th>Pounds VOC per gallon coating solids</th>
<th>Transfer Efficiency</th>
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<tr>
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<td>8.49 57.42% 0.00% 57.42% 0.00% 40.54% 2.250 0.146 7.580 9.88 9.88 1.79 42.77 7.84 0.06 23.16% 75%</td>
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<td>Reducer</td>
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<tr>
<td>Premium Wash Thinner</td>
<td>7.09 100.00% 0.00% 100.00% 0.00% 0.00% 0.146 0.101 7.29 7.29 0.03 0.71 0.16 0.00 #DIV/0! 75%</td>
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Clear Coat

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lbs/gal)</th>
<th>Weight % Volatile (water, VOC, and exempt compounds)*</th>
<th>Weight % Water and exempt compounds*</th>
<th>Weight % VOC</th>
<th>Volume % solids</th>
<th>Maximum Material Usage (gal/unit)</th>
<th>Maximum Capacity (units/hour)</th>
<th>Formula Pounds VOC per gallon coating less water and exempt compounds</th>
<th>Pounds VOC per gallon coating</th>
<th>PTE of VOC (lbs/day)</th>
<th>PTE of VOC (tons/year)</th>
<th>Uncontrolled PTE of PM10/PM2.5 (tons/year)</th>
<th>Pounds VOC per gallon coating solids</th>
<th>Transfer Efficiency</th>
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<tbody>
<tr>
<td>Autobase III</td>
<td>8.18 46.35% 4.96% 40.82% 0.00% 49.08% 2.250 0.146 7.580 3.31 3.31 1.04 25.06 4.57 1.53 6.75% 75%</td>
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Clear Coat

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<th>Density (lbs/gal)</th>
<th>Weight % Volatile (water, VOC, and exempt compounds)*</th>
<th>Weight % Water and exempt compounds*</th>
<th>Weight % VOC</th>
<th>Volume % solids</th>
<th>Maximum Material Usage (gal/unit)</th>
<th>Maximum Capacity (units/hour)</th>
<th>Formula Pounds VOC per gallon coating less water and exempt compounds</th>
<th>Pounds VOC per gallon coating</th>
<th>PTE of VOC (lbs/day)</th>
<th>PTE of VOC (tons/year)</th>
<th>Uncontrolled PTE of PM10/PM2.5 (tons/year)</th>
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<th>Transfer Efficiency</th>
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<tr>
<td>Autobase III</td>
<td>8.18 46.35% 4.96% 40.82% 0.00% 49.08% 2.250 0.146 7.580 3.31 3.31 1.04 25.06 4.57 1.53 6.75% 75%</td>
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<td>Hardener</td>
<td>8.51 34.11% 0.00% 34.11% 0.00% 38.16% 8.690 0.146 2.117 2.90 2.90 0.96 9.14 1.72 0.54 4.99% 75%</td>
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<th>Total Pounds VOC</th>
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<td>11.31</td>
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<td>52.65</td>
<td>83.64</td>
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Control Efficiency = 95.5%

Total Controlled Potential to Emit (PTE) (tons/year) = 6.34

Methodology

*Exempt compounds include all compounds specifically exempted from the definition of volatile organic compounds (VOC) under 40 CFR 51.103(x).

* SB1 - SB3 needs the ability to do either basecoat/color or clear coat. The worst case has been included in the PTE calculation.

Weight % VOC = (Weight % Volatile (water, VOC, and exempt compounds) - [Weight % water and exempt Compounds])

Maximum Material Usage (gal/unit) = [Maximum Material Usage (gal/unit)] [Maximum Capacity (units/hour)] [24 hours/day]

Pounds of VOC per gallon coating less water and exempt Compounds = [Density (lbs/gal)] [Weight % VOC]

PTE of VOC (lbs/day) = [Maximum Material Usage (gal/unit)] [Maximum Capacity (units/hour)] [Pounds of VOC per gallon coating]

PTE of VOC (tons/year) = [PTE of VOC (lbs/day)] [24 hours/day]

Uncontrolled PTE of PM10/PM2.5 (tons/year) = [Density (lbs/gal)] [Maximum Capacity (units/hour)] [1 - Weight % Volatile] [1 - Transfer Efficiency] [8760 hour/year] [1 ton/2000 lbs]

Pounds VOC per gallon coating solids = [Density (lbs/gal)] [Weight % VOCs] [Volume % Solids] 

Controlled PTE of PM10/PM2.5 (tons/year) = [Uncontrolled PTE of PM10/PM2.5 (tons/year)] [1 - Control Efficiency]
### Appendix A: Emissions Calculations

#### HAP Emissions

**From Surface Coating Operations**

**Company Name:** Color All Body Shop, Inc.  
**Source Address:** 25702 Miner Rd, Elkhart, Indiana 46514  
**Permit Number:** F039-41752-00755  
**Permit Reviewer:** Paul Jump

#### Material Density

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lbs/gal)</th>
<th>Gallon of Material (cubic feet)</th>
<th>Maximum units/hr</th>
<th>Weight % Methanol</th>
<th>Weight % Toluene</th>
<th>Weight % Xylene</th>
<th>Weight % Ethylbenzene</th>
<th>Methanol Emissions (tons/yr)</th>
<th>Toluene Emissions (tons/yr)</th>
<th>Xylene Emissions (tons/yr)</th>
<th>Ethylbenzene Emissions (tons/yr)</th>
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</tbody>
</table>

**METHODOLOGY**

PTE of HAP (tons/year) = [Density (lbs/gal)] * [Maximum Material Usage (gallons/unit)] * [Maximum Capacity (units/hour)] * [Weight % HAP] * [8760 hours/year] * [1 ton/2000 lbs]

PTE of Total HAPs (tons/year) = SUM (PTE of Each Single HAP (tons/year))

Hazardous air pollutant (HAP) is defined by Section 112(b) of the Clean Air Act.

**SB1 - SB3 needs the ability to do either basecoat/color or clear coat. The worst case has been included in the PTE calculation.**
## Appendix A: Emissions Calculations

### Natural Gas Combustion

**Company Name:** Color All Body Shop, Inc.  
**Source Address:** 25702 Miner Rd, Elkhart, Indiana 46514  
**Permit Number:** F039-41752-00755  
**Permit Reviewer:** Paul Jump

<table>
<thead>
<tr>
<th>Location</th>
<th>Unit ID</th>
<th>MMBtu/hr</th>
<th>Number of units</th>
<th>Total MMBtu/hr</th>
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</thead>
<tbody>
<tr>
<td>Miner Rd.</td>
<td>H1</td>
<td>2.50</td>
<td>1</td>
<td>2.5</td>
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<tr>
<td></td>
<td>AMU 1, AMU 2, AMU 3</td>
<td>0.20</td>
<td>3</td>
<td>0.6</td>
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<tr>
<td>Bryant SL</td>
<td>H2 - H3</td>
<td>0.25</td>
<td>2</td>
<td>0.5</td>
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<td>AMU 4</td>
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<td>1.2</td>
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### Heat Input Capacity

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<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
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<td>PM</td>
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<td>0.04</td>
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<td>PM10</td>
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<td>0.16</td>
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<td>SO2</td>
<td>7.6</td>
<td>0.16</td>
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<tr>
<td>NOX</td>
<td>0.6</td>
<td>0.01</td>
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<tr>
<td>VOC</td>
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<td>2.06</td>
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<td>CO</td>
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<td>0.11</td>
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<tr>
<td>**</td>
<td><strong>see below</strong></td>
<td>1.73</td>
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</table>

*PM emission factor is filterable PM only.  PM10 emission factor is filterable and condensable PM10 combined.  
PM2.5 emission factor is filterable and condensable PM2.5 combined.  
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.  
MMBu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

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<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total Organics</th>
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<tr>
<td></td>
<td>0.0021</td>
<td>0.0012</td>
<td>0.0750</td>
<td>1.8000</td>
<td>0.0034</td>
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</table>

Potential Emission in tons/yr = 4.33E-05, 2.47E-05, 1.55E-03, 0.04, 7.01E-05, 0.04

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total Metals</th>
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<td>0.0005</td>
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<td>0.0014</td>
<td>0.0004</td>
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</table>

Potential Emission in tons/yr = 1.03E-05, 2.27E-05, 2.89E-05, 7.83E-06, 4.33E-05, 1.13E-04

Total HAPs = 0.04  
Worst HAP = 0.04

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
### Fugitive Dust Emissions - Paved Roads

**Company Name:** Color All Body Shop, Inc.  
**Source Address:** 25702 Miner Rd, Elkhart, Indiana 46514  
**Permit Number:** F039-4172-00755  
**Reviewer:** Paul Jump

**Appendix A: Emission Calculations**

**Paved Roads at Industrial Site**

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

#### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per year (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mile/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
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<tbody>
<tr>
<td>Miner Rd. (Paving Material Plant)</td>
<td>6.0</td>
<td>2.5</td>
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<td>1.0</td>
<td>12.0</td>
<td>450</td>
<td>0.24</td>
<td>32.6</td>
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<tr>
<td>Bryant St. (Paving Material Plant)</td>
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<td>2.5</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>450</td>
<td>0.24</td>
<td>32.6</td>
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<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
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<td>10.0</td>
<td>10.0</td>
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<td>125</td>
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#### Totals

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<td>Miner Rd.</td>
<td>Bryant St.</td>
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<td>Average Vehicle Weight Per Trip (ton/trip)</td>
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<tr>
<td>Average Miles Per Trip (miles/trip)</td>
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#### Unmitigated Emission Factor, $E_f$ = $k \cdot (sL)^{0.91} \cdot (W)^{1.02}$ (Equation 1 from AP-42 13.2.1)

- $k$ = \[0.011 \text{ lb/VMT} \]  
- $W$ = \[4.7 \text{ tons} \]  
- $sL$ = \[9.7 \text{ g/m}^2 \]  

#### Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E \cdot \left[1 - \frac{p}{4N}\right]$ (Equation 2 from AP-42 13.2.1)

- $p$ = \[125 \text{ days of rain greater than or equal to } 0.01 \text{ inches} \]  
- $N$ = \[365 \text{ days per year} \]  

#### Dust Control Efficiency = 0%

#### Methodology

- **Unmitigated PTE (tons/yr)** = \[
\text{Maximum one-way miles (miles/yr)} \times \text{Unmitigated Emission Factor (lb/mile)} \times \left(\frac{\text{ton}}{2000 \text{ lbs}}\right)
\]
- **Mitigated PTE (Before Control) (tons/yr)** = \[
\text{Maximum one-way miles (miles/yr)} \times \text{Mitigated Emission Factor (lb/mile)} \times \left(\frac{\text{ton}}{2000 \text{ lbs}}\right)
\]
- **Mitigated PTE (After Control) (tons/yr)** = \[
\text{Mitigated PTE (Before Control) (tons/yr)} \times (1 - \text{Dust Control Efficiency})
\]

#### Abbreviations

- PM = Particulate Matter  
- PM10 = Particulate Matter (<10 um)  
- PM2.5 = Particulate Matter (<2.5 um)  
- TBE = Potential to Emit  
- $k$ = \[0.011 \text{ lb/VMT} \]  
- $W$ = \[4.7 \text{ tons} \]  
- $sL$ = \[9.7 \text{ g/m}^2 \]  
- $p$ = \[125 \text{ days of rain greater than or equal to } 0.01 \text{ inches} \]  
- $N$ = \[365 \text{ days per year} \]  
- $E_f$ = \[\text{Unmitigated Emission Factor} \]  
- $E_{ext}$ = \[\text{Mitigated Emission Factor} \]  
- $E = \[\text{Mitigated PTE (Before Control) (tons/yr)} \]  
- $1 - \text{Dust Control Efficiency} = 0\%$  
- *Abbreviation in control measures outlined in fugitive dust control plan*  

#### Summary Table

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (After Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (After Control) (tons/yr)</th>
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</thead>
<tbody>
<tr>
<td>Miner Rd. (Paving Material Plant)</td>
<td>[0.07]</td>
<td>[0.01]</td>
<td>[0.00]</td>
<td>[0.07]</td>
<td>[0.01]</td>
<td>[0.00]</td>
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<tr>
<td>Bryant St. (Paving Material Plant)</td>
<td>[0.06]</td>
<td>[0.00]</td>
<td>[0.00]</td>
<td>[0.06]</td>
<td>[0.00]</td>
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<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>[0.09]</td>
<td>[0.02]</td>
<td>[0.00]</td>
<td>[0.09]</td>
<td>[0.02]</td>
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<td>Vehicle (leaving plant) (one-way trip)</td>
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<td>[0.00]</td>
</tr>
</tbody>
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#### Totals

<p>| | | | | | | |</p>
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</thead>
<tbody>
<tr>
<td></td>
<td>Miner Rd.</td>
<td>Bryant St.</td>
<td>Miner Rd.</td>
<td>Bryant St.</td>
<td>Vehicle (leaving plant)</td>
<td>Vehicle (leaving plant)</td>
</tr>
<tr>
<td><strong>Mitigated PTE of PM (Before Control) (tons/yr)</strong></td>
<td>[0.21]</td>
<td>[0.04]</td>
<td>[0.01]</td>
<td>[0.21]</td>
<td>[0.04]</td>
<td>[0.01]</td>
</tr>
<tr>
<td><strong>Mitigated PTE of PM10 (Before Control) (tons/yr)</strong></td>
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<tr>
<td><strong>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</strong></td>
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<tr>
<td><strong>Mitigated PTE of PM (After Control) (tons/yr)</strong></td>
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<tr>
<td><strong>Mitigated PTE of PM10 (After Control) (tons/yr)</strong></td>
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<tr>
<td><strong>Mitigated PTE of PM2.5 (After Control) (tons/yr)</strong></td>
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</tr>
</tbody>
</table>

#### Notes

- Equation 1: $E_f = \frac{k \cdot (sL)^{0.91} \cdot (W)^{1.02}}{VMT}$
- Equation 2: $E_{ext} = E_f \cdot \left[1 - \frac{p}{4N}\right]$

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Page 6 of 7, TSD App. A

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Appendix A: Emission Calculations

Fugitive Dust Emissions - Unpaved Roads

Company Name: Color All Body Shop, Inc.
Source Address: 25702 Miner Rd, Elkhart, Indiana 46514
Permit Number: F039-41752-00755
Reviewer: Paul Jump

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum Weight of Loaded Vehicle</th>
<th>Total Weight driven per day</th>
<th>Maximum one-way distance (trip/day)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way distance (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Miner Rd</td>
<td>8.0</td>
<td>2.0</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>486</td>
<td>0.085</td>
<td>1.0</td>
</tr>
<tr>
<td>Vehicle leaving plant (one-way trip)</td>
<td>8.0</td>
<td>2.0</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>486</td>
<td>0.085</td>
<td>1.0</td>
</tr>
</tbody>
</table>

**Totals**: 24.0 24.0 2.0 746.6

### Average Vehicle Weight Per Trip =

\[ \text{Average Vehicle Weight Per Trip} = \frac{\text{Average Miles Per Trip}}{\text{Average Vehicle Weight Per Trip}} \]

### Unmitigated Emission Factor, \( E_{f} = k \times (s/12)^a \times (W/3)^b \) (Equation 1a from AP-42 13.2.2)

- \( k = \) particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
- \( s = \) mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
- \( a = \) constant (AP-42 Table 13.2.2-2 for Industrial Roads)
- \( W = \) average vehicle weight
- \( b = \) constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( E_{ext} = E_{f} \times \frac{(365 - P)/365}{(365 - P)/365} \) (Equation 2 from AP-42 13.2.2)

where \( P = \) 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

### Process

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (ton/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (ton/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (ton/yr)</th>
<th>Mitigated PTE of PM (After Control) (ton/yr)</th>
<th>Mitigated PTE of PM10 (After Control) (ton/yr)</th>
<th>Mitigated PTE of PM2.5 (After Control) (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>0.23</td>
<td>0.06</td>
<td>0.01</td>
<td>0.23</td>
<td>0.06</td>
<td>0.01</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>0.23</td>
<td>0.06</td>
<td>0.01</td>
<td>0.23</td>
<td>0.06</td>
<td>0.01</td>
</tr>
</tbody>
</table>

**Totals**: 0.45 0.12 0.01 0.45 0.12 0.01

### Methodology

- Total Weight driven per day (ton/day) = Maximum Weight of Loaded Vehicle (ton/trip) * Maximum trips per day (trip/day)
- Maximum one-way distance (mi/trip) = Maximum one-way distance (feet/trip) / 5280
- Maximum Miles Per Trip (miles/trip) = SUM(Maximum miles per trip/trip/day)
- Mitigated PTE (Before Control) (ton/yr) = (Mitigated PTE (Before Control) (ton/yr)) * (1 - Dust Control Efficiency)

### Abbreviations

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit
- P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

### Dust Control Efficiency

0% 0% 0% (pursuant to control measures outlined in fugitive dust control plan)
October 10, 2019

Dunaiky Bauta  
Color All Body Shop, Inc.  
25702 Miner Rd  
Elkhart, IN   46514

Re: Public Notice  
Color All Body Shop, Inc.  
Permit Level: FESOP  
Permit Number: 039-41752-00755

Dear Dunaiky Bauta:

Enclosed is a copy of your draft FESOP, 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 Paul Jump, 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 4-6555 or dial (317) 234-6555.

Sincerely,

Theresa Weaver  
Theresa Weaver  
Permits Branch  
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
October 10, 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: Color All Body Shop, Inc.
Permit Number: 039-41752-00755

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 10, 2019
Color All Body Shop, Inc.
039-41752-00755

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
## Mail Code 61-53

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<td>Dunaiky Bauta Color All Body Shop Inc 25702 Miner Rd Elkhart IN 46514 (Source CAATS)</td>
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**Total number of pieces Listed by Sender**

**Total number of Pieces Received at Post Office**

**Postmaster, Per (Name of Receiving employee)**

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See *Domestic Mail Manual* R900, S913, and S921 for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.