NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

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

for Novae Corporation in Huntington County

FESOP Renewal No.: F069-41412-00066

The Indiana Department of Environmental Management (IDEM) has received an application from Novae Corporation located at 1 Novae Parkway, Markle, Indiana 46770 for a renewal of its FESOP issued on February 18, 2015. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Novae Corporation 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:

Huntington City - Township Public Library
155 W. Sparks Street
Markle, IN 46770

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 069-41412-00066 in all correspondence.

Comments should be sent to:

Michaela Hecox
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Michaela Hecox or (317) 233-3031
Or dial directly: (317) 233-3031
Fax: (317) 232-6749 attn: Michaela Hecox
E-mail: MHecox@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](http://www.in.gov/idem/airquality/2356.htm); and the Citizens' Guide to IDEM on the Internet at: [http://www.in.gov/idem/8900.htm](http://www.in.gov/idem/8900.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, 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 Michaela Hecox of my staff at the above address.

[Signature]
Brian Williams, Section Chief
Permits Branch
Office of Air Quality
Federal Enforceable State Operating Permit Renewal

OFFICE OF AIR QUALITY

Novae Corporation
1 Novae Parkway
Markle, Indiana 46770

(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.

Operation Permit No.: F 069-41412-00066
Master Agency Interest ID: 35030

Issued by:
Brian Willams, Section Chief
Permits Branch
Office of Air Quality

Issuance Date:
Expiration Date:
TABLE OF CONTENTS

SECTION A SOURCE SUMMARY ......................................................................................................... 5
A.1 General Information [326 IAC 2-8-3(b)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]
A.4 FESOP Applicability [326 IAC 2-8-2]

SECTION B GENERAL CONDITIONS ................................................................................................... 8
B.1 Definitions [326 IAC 2-8-1]
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]
B.5 Severability [326 IAC 2-8-4(5)(E)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]
B.12 Emergency Provisions [326 IAC 2-8-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
B.16 Permit Renewal [326 IAC 2-8-3(h)]
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.19 Source Modification Requirement [326 IAC 2-8-11.1]
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]
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
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]
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS ............................................................................. 18
Emission Limitations and Standards [326 IAC 2-8-4(1)] ............................................................................. 18
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
C.2 Overall Source Limit [326 IAC 2-8]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
Testing Requirements [326 IAC 2-8-4(3)] ......................................................................................... 20
C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11] ................................................................................... 20
C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] ................................................................................... 21
C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] ................................................................................... 21
C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]
C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ............................................. 22
C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

Stratospheric Ozone Protection ................................................................................................. 24
C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS ......................................................... 25
Emission Limitations and Standards [326 IAC 2-8-4(1)] .......................................................... 25
D.1.1 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2]
D.1.2 PSD Minor Limits [326 IAC 2-2]
D.1.3 Particulate [326 IAC 6-3-2(e)]
D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements [326 IAC 2-8-4(1)] .................................................. 26
D.1.5 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] ....................... 26
D.1.6 Broken or Failed Cartridge or Filter
D.1.7 Baghouse Inspections

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ............................................. 27
D.1.8 Record Keeping Requirement

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS ......................................................... 28
Emission Limitations and Standards [326 IAC 2-8-4(1)] .......................................................... 28
D.2.1 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2]
D.2.2 PSD Minor Limit [326 IAC 2-2]
D.2.3 Particulate [326 IAC 6-3-2(e)]
D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements [326 IAC 2-8-4(1)] .................................................. 29
D.2.5 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] ....................... 29
D.2.6 Broken or Failed Bag Detection - Dust Collector
D.2.7 Baghouse Inspections

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ............................................. 30
D.2.8 Record Keeping Requirement

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS ......................................................... 31
Emission Limitations and Standards [326 IAC 2-8-4(1)] .......................................................... 31
D.3.1 Particulate [326 IAC 6-3-2(d)]
D.3.2 Volatile Organic Compounds [326 IAC 8-2-9]
D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements [326 IAC 2-8-4(1)] .................................................. 32
D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]
D.3.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] ....................... 32
D.3.6 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ............................................. 33
D.3.7 Record Keeping Requirement
SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS .............................................................. 34
  Emission Limitations and Standards [326 IAC 2-8-4(1)] ......................................................... 35
  D.4.1 Particulate Emissions Limitation [326 IAC 6-2-4]

CERTIFICATION ........................................................................................................................................ 36

EMERGENCY OCCURRENCE REPORT ............................................................................................... 37

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT ........................................... 39
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 trailer manufacturing plant.

- **Source Address:** 1 Novae Parkway, Markle, Indiana 46770
- **General Source Phone Number:** (260) 758-9838
- **SIC Code:** 3799 (Transportation Equipment, Not Elsewhere Classified)
- **County Location:** Huntington
- **Source Location Status:** Attainment for all criteria pollutants
- **Source Status:** Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) Building 1, consisting of the following:

1. **Powder Coating Line 1,** constructed in 2004, and consisting of the following:
   (A) One (1) natural gas fired hot water power wash station, identified as PWS 1, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.
   (B) One (1) natural gas fired drying oven, identified as PCDOV, with a maximum heat input capacity of 0.25 MMBtu/hr.
   (C) One (1) powder coating booth, with a maximum coating usage of 8 pounds per unit and a maximum throughput rate of 8 parts per hour, controlled by cartridge filters, and exhausting indoors.
   (D) One (1) natural gas fired curing oven, identified as PCCOV, with a maximum heat input capacity of 2.5 MMBtu/hr.

2. **Wet Paint Coating Line 2,** constructed in 2005, and consisting of the following:
   (A) One (1) wet paint booth, identified as PB1, using HVLP spray guns, with a maximum throughput rate of 8 trailers per day, controlled by dry filters, and exhausting outside through stacks PB1 and PB2.
   (B) One (1) natural gas fired hot water power wash station, identified as PWS 2, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.

3. **One (1) natural gas-fired closed loop integrated solids removal evaporator/
crystallizer, identified as WWE, permitted in 2018, with a maximum capacity of 0.87 MMBtu/hr, uncontrolled, and exhausting outdoors through stack WWE1.

(b) Building 2, North operations consisting of the following:

1. One (1) shot blast room, identified as SBCN, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.

2. One (1) natural gas fired power wash hot water heater, identified as PWHN, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.

3. One (1) natural gas fired dry off oven, identified as DOOVN, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.

4. One (1) powder coating booth, identified as PCBN, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.

5. One (1) natural gas fired curing oven, identified as BKOVN, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.

6. Three (3) natural gas fired building heat make-up air heaters, identified as AMU-1 through AMU-3, constructed in 2014, with a maximum heat input capacity of 7.0 MMBtu/hr.

(c) Building 2, South operations consisting of the following:

1. One (1) shot blast room, identified as SBCS, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.

2. One (1) natural gas fired power wash hot water heater, identified as PWHS, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.

3. One (1) natural gas fired dry off oven, identified as DOOVS, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.

4. One (1) powder coating booth, identified as PCBS, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.

5. One (1) natural gas fired curing oven, identified as BKOVS, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.

(d) Twenty-five (25) portable MIG welding stations, constructed in 2014, with a maximum electrode consumption rate of 12.5 pounds per hour, located throughout Building 1 and Building 2.

A.3 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:

(a) Paved and unpaved roads.
A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew 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, F 069-41412-00066, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability [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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
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).

The Permittee shall implement the PMPs.

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

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

B.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 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
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 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 F 069-41412-00066 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.

<table>
<thead>
<tr>
<th>B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]</th>
</tr>
</thead>
<tbody>
<tr>
<td>(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 &quot;authorized individual&quot; as defined by 326 IAC 2-1.1-1(1).</td>
</tr>
<tr>
<td>(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:</td>
</tr>
<tr>
<td>(1) That this permit contains a material mistake.</td>
</tr>
<tr>
<td>(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.</td>
</tr>
<tr>
<td>(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]</td>
</tr>
<tr>
<td>(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)]</td>
</tr>
<tr>
<td>(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)]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B.16 Permit Renewal [326 IAC 2-8-3(h)]</th>
</tr>
</thead>
<tbody>
<tr>
<td>(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 &quot;authorized individual&quot; as defined by 326 IAC 2-1.1-1(1).</td>
</tr>
</tbody>
</table>
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)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(5) The Permittee maintains records on-site, 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:
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.

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.

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.

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

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) 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:

(a) Building 1, consisting of the following:
   (1) Powder Coating Line 1, constructed in 2004, and consisting of the following:
      (C) One (1) powder coating booth, with a maximum coating usage of 8 pounds per unit and a maximum throughput rate of 8 parts per hour, controlled by cartridge filters, and exhausting indoors.

(b) Building 2, North operations consisting of the following:
   (4) One (1) powder coating booth, identified as PCBN, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.

(c) Building 2, South operations consisting of the following:
   (4) One (1) powder coating booth, identified as PCBS, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.

(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 and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall not exceed the following limits:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM10 (lb/hr)</th>
<th>PM2.5 (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating Booth (Building 1)</td>
<td>4.00</td>
<td>4.00</td>
</tr>
<tr>
<td>Powder Coating Booth North (Building 2)</td>
<td>3.13</td>
<td>3.13</td>
</tr>
<tr>
<td>Powder Coating Booth South (Building 2)</td>
<td>3.13</td>
<td>3.13</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating Booth (Building 1)</td>
<td>4.00</td>
</tr>
<tr>
<td>Powder Coating Booth North (Building 2)</td>
<td>3.13</td>
</tr>
<tr>
<td>Powder Coating Booth South (Building 2)</td>
<td>3.13</td>
</tr>
</tbody>
</table>
Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than two-hundred fifty (250) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the powder coating operations shall comply with the following:

<table>
<thead>
<tr>
<th>Emission Unit (ID)</th>
<th>Rate of Emission (lb/hr)</th>
<th>Process Weight Rate (ton/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating - Building 1</td>
<td>1.54</td>
<td>0.232</td>
</tr>
<tr>
<td>Powder Coating Booth North - Building 2</td>
<td>16.82</td>
<td>8.225</td>
</tr>
<tr>
<td>Powder Coating Booth South - Building 2</td>
<td>16.82</td>
<td>8.225</td>
</tr>
</tbody>
</table>

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

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

\[ E = 4.10 P^{0.67} \]

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

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

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B -- Preventive Maintenance Plan contains the Permittee’s obligation with regard to preventive maintenance plans.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

(a) In order to ensure compliance with Conditions D.1.1 and D.1.2, the dust collector for PM, PM10, and PM2.5 control shall be in operation and control emissions from the Booth North - Building 2 and Booth South - Building 2 powder coating booths at all times the powder coating booths are in operation.

(b) In order to ensure compliance with Conditions D.1.1, D.1.2, and D.1.3, the filter cartridge for PM, PM10, and PM2.5 control shall be in operation and control emissions from the Building 1 powder coating booth at all times the booth is in operation.

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

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

D.1.6 Broken or Failed Cartridge or Filter

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

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

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

D.1.7 Baghouse Inspections

The Permittee shall perform quarterly inspections of the baghouses controlling particulate from the powder coating operations to verify that they are being operated and maintained in accordance with the manufacturer’s specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.1.8 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.7 - Baghouse Inspections, the Permittee shall maintain records of the baghouses quarterly inspections.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall not exceed the following limits:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM10 (lb/hr)</th>
<th>PM2.5 (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot Blasting Unit (SBCN)</td>
<td>3.54</td>
<td>3.54</td>
</tr>
<tr>
<td>Shot Blasting Unit (SBCS)</td>
<td>3.54</td>
<td>3.54</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one-hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.2.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot Blasting Unit (SBCN)</td>
<td>3.54</td>
</tr>
<tr>
<td>Shot Blasting Unit (SBCS)</td>
<td>3.54</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two-hundred fifty (250) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
D.2.3 Particulate [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the shot blasting operations shall comply with the following:

<table>
<thead>
<tr>
<th>Emission Unit (ID)</th>
<th>Rate of Emission (lb/hr)</th>
<th>Process Weight Rate (ton/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot Blast Unit North - Building 2</td>
<td>19.13</td>
<td>9.97</td>
</tr>
<tr>
<td>Shot Blast Unit South - Building 2</td>
<td>19.13</td>
<td>9.97</td>
</tr>
</tbody>
</table>

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

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

\[ E = 4.10 P^{0.67} \]

where

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

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B -- Preventive Maintenance Plan contains the Permittee's obligation with regard to preventive maintenance plans.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.2.5 Particulate Control

In order to ensure compliance with Conditions D.2.1 and D.2.2, the dust collector for PM, PM10, and PM2.5 control shall be in operation and control emissions from the two (2) shot blast units at all times the two (2) shot blast units are in operation.

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

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

D.2.6 Broken or Failed Bag Detection - Dust Collector

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

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.7 Baghouse Inspections

The Permittee shall perform quarterly inspections of the baghouses controlling particulate from the shot blast operations to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.2.8 Record Keeping Requirement

(a) To document the compliance status with Condition D.2.7 - Baghouse Inspections, the Permittee shall maintain records of the baghouses quarterly inspections.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
SECTION D.3  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Building 1, consisting of the following:

(2) Wet Paint Coating Line 2, constructed in 2005, and consisting of the following:

(A) One (1) wet paint booth, identified as PB1, using HVLP spray guns, with a maximum throughput rate of 8 trailers per day, controlled by dry filters, and exhausting outside through stacks PB1 and PB2.

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

Pursuant to 326 IAC 6-3-2(d), particulate from PB1 shall be controlled by a dry particulate, waterwash, or an equivalent control device, and the source shall operate the control device in accordance with manufacturer's specifications.

D.3.2 Volatile Organic Compounds [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9(c)(1), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of four and three-tenths (4.3) pounds of VOC per gallon of coating, excluding water, as delivered to a coating applicator that applies clear coatings.

(b) Pursuant to 326 IAC 8-2-9(c)(2), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five tenths (3.5) pounds of VOC per gallon of coating, excluding water, for non-clear coat coatings, as delivered to the applicator.

(c) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan is required for this facility and its control device. 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.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]
Compliance with the VOC content contained in Condition D.3.2 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 in 326 IAC 8-1-4.

D.3.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
When using non-compliant coatings, compliance with the VOC content contained in Condition D.3.2, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a daily volume weighted average of coatings on daily basis.

The volume weighted average shall be determined by the following equation:

\[ A = \frac{\sum (c \times U)}{\sum U} \]

Where:

- \( A \) is the volume weighted average in pounds VOC per gallon less water as applied;
- \( C \) is the VOC content of the coating in pounds VOC per gallon less water as applied; and
- \( U \) is the usage rate of the coating in gallons per day.

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

D.3.6 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 PB1 stack 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 required by this condition. Failure to take a reasonable response 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 required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.7 Record Keeping Requirement

(a) To document the compliance status with Conditions D.3.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.3.2.

1. The VOC content of each coating material and solvent used less water.

2. The amount of coating material and solvent used on daily basis for each booth.
   (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 solvent.

3. The daily cleanup solvent usage; and

4. The total VOC usage for each day.

5. The dates and times when non-compliant coatings are used and at what booth the non-compliant coatings are used.

6. During periods when non-compliant coatings are used:
   (A) The volume weighted average VOC content of the coatings used for each day.

(b) To document the compliance status with Condition D.3.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(b) Section C - General Record Keeping Requirements contains the Permittee’s obligation with regard to the records required by this condition.
SECTION D.4  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Building 1, consisting of the following:

(1) Powder Coating Line 1, constructed in 2004, and consisting of the following:

(A) One (1) natural gas fired hot water power wash station, identified as PWS 1, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.

(B) One (1) natural gas fired drying oven, identified as PCDOV, with a maximum heat input capacity of 0.25 MMBtu/hr.

(D) One (1) natural gas fired curing oven, identified as PCCOV, with a maximum heat input capacity of 2.5 MMBtu/hr.

(2) Wet Paint Coating Line 2, constructed in 2005, and consisting of the following:

(B) One (1) natural gas fired hot water power wash station, identified as PWS 2, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.

(3) One (1) natural gas-fired closed loop integrated solids removal evaporator/crystallizer, identified as WWE, permitted in 2018, with a maximum capacity of 0.87 MMBtu/hr, uncontrolled, and exhausting outdoors through stack WWE1.

(b) Building 2, North operations consisting of the following:

(2) One (1) natural gas fired power wash hot water heater, identified as PWHN, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.

(3) One (1) natural gas fired dry off oven, identified as DOOVN, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.

(5) One (1) natural gas fired curing oven, identified as BKOVN, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.

(6) Three (3) natural gas fired building heat make-up air heaters, identified as AMU-1 through AMU-3, constructed in 2014, with a maximum heat input capacity of 7.0 MMBtu/hr.

(c) Building 2, South operations consisting of the following:

(2) One (1) natural gas fired power wash hot water heater, identified as PWHS, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.

(3) One (1) natural gas fired dry off oven, identified as DOOVS, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.

(5) One (1) natural gas fired curing oven, identified as BKOVS, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.
Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Pt (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hot Water Power Wash Station</td>
<td>PWS-1</td>
<td>0.6</td>
</tr>
<tr>
<td>Drying Oven</td>
<td>PCDOV</td>
<td>0.6</td>
</tr>
<tr>
<td>Curing Oven</td>
<td>PCCOV</td>
<td>0.6</td>
</tr>
<tr>
<td>Hot Water Power Wash Station</td>
<td>PWS-2</td>
<td>0.6</td>
</tr>
<tr>
<td>North Dry Off Oven</td>
<td>DOOVN</td>
<td>0.46</td>
</tr>
<tr>
<td>South Dry Off Oven</td>
<td>DOOVS</td>
<td>0.46</td>
</tr>
<tr>
<td>North Cure Oven</td>
<td>BKOVN</td>
<td>0.46</td>
</tr>
<tr>
<td>South Cure Oven</td>
<td>BKOVS</td>
<td>0.46</td>
</tr>
<tr>
<td>North Power Wash Water Heater</td>
<td>PWHN</td>
<td>0.46</td>
</tr>
<tr>
<td>South Power Wash Water Heater</td>
<td>PWHS</td>
<td>0.46</td>
</tr>
<tr>
<td>Three (3) Building Heat Make-Up Air Heaters</td>
<td>AMU-1, AMU-2, AMU-3</td>
<td>0.46</td>
</tr>
<tr>
<td>Evaporator/Crystallizer</td>
<td>WWE</td>
<td>0.46</td>
</tr>
</tbody>
</table>
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Novae Corporation
Source Address: 1 Novae Parkway, Markle, Indiana 46770
FESOP Permit No.: F 069-41412-00066

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:** Novae Corporation  
**Source Address:** 1 Novae Parkway, Markle, Indiana 46770  
**FESOP Permit No.:** F 069-41412-00066

This form consists of 2 pages

<table>
<thead>
<tr>
<th>☐ This is an emergency as defined in 326 IAC 2-7-1(12)</th>
</tr>
</thead>
<tbody>
<tr>
<td>- 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</td>
</tr>
<tr>
<td>- 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</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Facility/Equipment/Operation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Control Equipment:</td>
</tr>
<tr>
<td>Permit Condition or Operation Limitation in Permit:</td>
</tr>
<tr>
<td>Description of the Emergency:</td>
</tr>
<tr>
<td>Describe the cause of the Emergency:</td>
</tr>
</tbody>
</table>
If any of the following are not applicable, mark N/A

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
<tr>
<td>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:</td>
</tr>
</tbody>
</table>

Form Completed by: ________________________________________________
Title / Position: ____________________________________________________
Date: ____________________________________________________________
Phone: ___________________________________________________________
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

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------------------------------------------</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: _______________________________________________________
Title / Position: ___________________________________________________________
Date: ___________________________________________________________________
Phone: _________________________________________________________________
Indiana Department of Environmental Management  
Office of Air Quality  
Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Description and Location**

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Novae Corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>1 Novae Parkway, Markle, IN 46770</td>
</tr>
<tr>
<td>County:</td>
<td>Huntington (Union Township)</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3799 (Transportation Equipment, Not Elsewhere Classified)</td>
</tr>
<tr>
<td>Permit Renewal No.:</td>
<td>F 069-41412-00066</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Michaela Hecox</td>
</tr>
</tbody>
</table>

On May 1, 2019, Novae Corporation submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Novae Corporation relating to the operation of a stationary trailer manufacturing plant. Novae Corporation was issued its first FESOP (F069-35005-00066) on February 18, 2015.

**Existing Approvals**

The source was issued FESOP No. F 069-35005-00066 on February 18, 2015. The source has since received the following approval:

(a) FESOP Administrative Amendment No. 069-38849-00066, issued on August 22, 2017; and

(b) FESOP Administrative Amendment No. 069-39363-00066, issued on January 3, 2018.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

**Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

(a) Building 1, consisting of the following:

(1) Powder Coating Line 1, constructed in 2004, and consisting of the following:

   (A) One (1) natural gas fired hot water power wash station, identified as PWS 1, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.

   (B) One (1) natural gas fired drying oven, identified as PCDOV, with a maximum heat input capacity of 0.25 MMBtu/hr.

   (C) One (1) powder coating booth, with a maximum coating usage of 8 pounds per unit and a maximum throughput rate of 8 parts per hour, controlled by cartridge filters, and exhausting indoors.

   (D) One (1) natural gas fired curing oven, identified as PCCOV, with a maximum heat input capacity of 2.5 MMBtu/hr.
(2) Wet Paint Coating Line 2, constructed in 2005, and consisting of the following:

(A) One (1) wet paint booth, identified as PB1, using HVLP spray guns, with a maximum throughput rate of 8 trailers per day, controlled by dry filters, and exhausting outside through stacks PB1 and PB2.

(B) One (1) natural gas fired hot water power wash station, identified as PWS 2, with a maximum heat input capacity of 0.25 MMBtu/hr and a maximum throughput rate of 8 trailers per hour.

(3) One (1) natural gas-fired closed loop integrated solids removal evaporator/ crystallizer, identified as WWE, permitted in 2018, with a maximum capacity of 0.87 MMBtu/hr, uncontrolled, and exhausting outdoors through stack WWE1.

(b) Building 2, North operations consisting of the following:

(1) One (1) shot blast room, identified as SBCN, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.

(2) One (1) natural gas fired power wash hot water heater, identified as PWHN, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.

(3) One (1) natural gas fired dry off oven, identified as DOOVN, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.

(4) One (1) powder coating booth, identified as PCBN, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.

(5) One (1) natural gas fired curing oven, identified as BKOVN, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.

(6) Three (3) natural gas fired building heat make-up air heaters, identified as AMU-1 through AMU-3, constructed in 2014, with a maximum heat input capacity of 7.0 MMBtu/hr.

(c) Building 2, South operations consisting of the following:

(1) One (1) shot blast room, identified as SBCS, constructed in 2014, utilizing LG-80 as the blasting media, using one (1) nozzle at 3/8th inch diameter and nozzle pressure of 100 psig, with a maximum abrasive flow rate of 3,541 lb/hour per nozzle of steel grit, controlled by a dust collector, and exhausting indoors.

(2) One (1) natural gas fired power wash hot water heater, identified as PWHS, constructed in 2014, with a maximum heat input capacity of 3.50 MMBtu/hr.

(3) One (1) natural gas fired dry off oven, identified as DOOVS, constructed in 2014, with a maximum heat input capacity of 2.00 MMBtu/hr.

(4) One (1) powder coating booth, identified as PCBS, constructed in 2014, with a coating usage of 25 pounds per trailer and a maximum throughput rate of 2 trailers per hour, controlled by a dust collector, and exhausting indoors.

(5) One (1) natural gas fired curing oven, identified as BKOVS, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu/hr.
(d) Twenty-five (25) portable MIG welding stations, constructed in 2014, each with a maximum electrode consumption rate of 12.5 pounds per hour, located throughout Building 1 and Building 2.

### Insignificant Activities

The source also consists of the following insignificant activities:

(a) Paved and unpaved roads.

### Enforcement Issue

There are no enforcement actions pending.

### Emission Calculations

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

### County Attainment Status

The source is located in Huntington County (Union Township).

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

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(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. Huntington 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

Huntington 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

Huntington County (Union Township) 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.5¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>318.83</td>
<td>302.15</td>
<td>302.15</td>
<td>0.07</td>
<td>12.07</td>
<td>13.83</td>
<td>10.14</td>
<td>3.72</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>--</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.
*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 PM10 and PM2.5 is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM10 and PM2.5 emissions to less than Title V major source thresholds. Therefore, the source will be issued a FESOP Renewal.
(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

### Potential to Emit After Issuance

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

<table>
<thead>
<tr>
<th>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}$$^1$</th>
<th>PM$_{2.5}$$^{1, 2}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total PTE of Entire Source Excluding Fugitive Emissions</strong></td>
<td>84.08</td>
<td>84.76</td>
<td>84.76</td>
<td>0.07</td>
<td>12.07</td>
<td>13.83</td>
<td>10.14</td>
<td>3.72</td>
</tr>
<tr>
<td><strong>Title V Major Source Thresholds</strong></td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td><strong>PSD Major Source Thresholds</strong></td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Emission Offset Major Source Thresholds</strong></td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

*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$_{2.5}$.

*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 limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-8 (FESOP) and 326 IAC 2-2 (PSD) for more information regarding the limit(s).

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

(b) This source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
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 perform surface coating on automobiles or light duty trucks as defined in 40 CFR 60.391.

(b) There are no other 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 Halogenated Solvent Cleaning, 40 CFR 63, Subpart T and 326 IAC 20-6, are not included in the permit for this source, since the solvent used in the spray gun operations does not contain any regulated halogenated solvents.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM and 326 IAC 20-80, are not included in the permit for this source, since this is an area source.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95, are not included in the permit for this source, since this is an area source.

(d) 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 any of the following: paint stripping operations of any kind; auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations; or spray application of coatings containing a targeted HAPs to any part or product made of metal or plastic or combination of metal and plastic. Chassis are not considered mobile equipment because the definition of motor vehicle and mobile equipment surface coating means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJJJ, are not included in the permit for this source, since the hot water heaters and hot water power wash stations are all gas-fired boilers as indicated, and therefore, pursuant to 40 CFR 63.11195(e) are not subject to the NESHAP.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit for this source, since the source is not primarily engaged in the operations listed as one of the nine source categories for this subpart.

(g) 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):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the 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.

State Rule Applicability - Entire Source

**326 IAC 2-2 (PSD)**

PSD applicability is discussed under the Potential to Emit After Issuance section of this document.

**PSD Minor Source Limits**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The PM, PM10, and PM2.5 emissions from the emission units listed in the table below shall not exceed the following values:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM (lb/hr)</th>
<th>PM10 (lb/hr)</th>
<th>PM2.5 (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating Booth (Building 1)</td>
<td>4.00</td>
<td>4.00</td>
<td>4.00</td>
</tr>
<tr>
<td>Powder Coating Booth North (Building 2)</td>
<td>3.13</td>
<td>3.13</td>
<td>3.13</td>
</tr>
<tr>
<td>Powder Coating Booth South (Building 2)</td>
<td>3.13</td>
<td>3.13</td>
<td>3.13</td>
</tr>
<tr>
<td>Shot Blasting Unit (SBCN)</td>
<td>3.54</td>
<td>3.54</td>
<td>3.54</td>
</tr>
<tr>
<td>Shot Blasting Unit (SBCS)</td>
<td>3.54</td>
<td>3.54</td>
<td>3.54</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10 and PM2.5 to less than two-hundred fifty (250) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

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)**

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.
**326 IAC 2-8-4 (FESOP)**

FESOP applicability is discussed under the Potential to Emit After Issuance section of this document.

**FESOP PM10 and PM2.5 Limit(s)**

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The PM10, and PM2.5 emissions from the emission units listed in the table below shall not exceed the following values:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM10 (lb/hr)</th>
<th>PM2.5 (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating Booth (Building 1)</td>
<td>4.00</td>
<td>4.00</td>
</tr>
<tr>
<td>Powder Coating Booth North (Building 2)</td>
<td>3.13</td>
<td>3.13</td>
</tr>
<tr>
<td>Powder Coating Booth South (Building 2)</td>
<td>3.13</td>
<td>3.13</td>
</tr>
<tr>
<td>Shot Blasting Unit (SBCN)</td>
<td>3.54</td>
<td>3.54</td>
</tr>
<tr>
<td>Shot Blasting Unit (SBCS)</td>
<td>3.54</td>
<td>3.54</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

**326 IAC 5-1 (Opacity Limitations)**

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2).

**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 Huntington 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 Huntington County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

**326 IAC 6.8 (Lake County: Fugitive Particulate Matter)**

Pursuant to 326 IAC 6.8-10-1, this source (located in Huntington County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.
State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

Powder Coating Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the powder coating operations because they are a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and are not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c). Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions shall not exceed the pound per hour limits when operating at the process weight rates listed in the table below:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process Weight Rate (tons/hr)</th>
<th>PM Emission Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating - Building One</td>
<td>0.232</td>
<td>1.54</td>
</tr>
<tr>
<td>Powder Coating Booth North - Building 2</td>
<td>8.225</td>
<td>16.82</td>
</tr>
<tr>
<td>Powder Coating Booth South - Building 2</td>
<td>8.225</td>
<td>16.82</td>
</tr>
</tbody>
</table>

The cartridge filter shall be in operation at all times the powder coating operation in Building One is in operation, in order to comply with this emission limit.

The Powder Coating Booth North (Building 2) and the Powder Coating Booth South (Building 2) are both able to comply with the emission limits without the use of a control device.

The pound per hour limitations were calculated with the following equation:

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

\[ E = 4.10 P^{0.67} \]

Where:

\[ E = \text{rate of emission in pounds per hour} \]
\[ P = \text{process weight rate in tons per hour} \]

Shot Blasting Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the shot blasting operations because they are a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and are not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c). Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions shall not exceed the pound per hour limits when operating at the process weight rates listed in the table below:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process Weight Rate (tons/hr)</th>
<th>PM Emission Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot Blast Unit North - Building 2</td>
<td>9.97</td>
<td>19.13</td>
</tr>
</tbody>
</table>
NOTE: The process weight rate used for the Rate of Emission (lb/hr) limitation for Shot Blast Unit North – Building 2 and Shot Blast Unit South – Building 2 is based on shot blasting a maximum of two (2) trailers per unit per hour at 8,200 pounds per trailer.

The Shot Blast Unit North (Building 2) and the Shot Blast Unit South (Building 2) are both able to comply with the emission limits without the use of a control device.

The pound per hour limitations were calculated with the following equation:

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

\[ E = 4.10 P^{0.67} \]

Where:

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

Surface Coating - Wet Paint Booth (PB1)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2(d) are applicable to the Wet Paint Booth (PB1), since it has the potential to use more than five (5) gallons of coating per day. Pursuant to 326 IAC 6-3-2(d), particulate from the Wet Paint Booth (PB1) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control device in accordance with manufacturer’s specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1-6(1), the Wet Paint Booth (PB1) is not subject to the requirements of 326 IAC 8-1-6, because the unlimited VOC potential emissions of this unit is less than 25 tons per year.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)
The Wet Paint Booth (PB1) is not subject to the requirements of 326 IAC 8-2-2 (Automobile & Light Duty Truck Coating Operation), because this source does not operate an automotive and light duty truck assembly plant.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
(a) Pursuant to 326 IAC 8-2-1(a) and 326 IAC 8-2-9(a), the Wet Paint Booth (PB1) is subject to the requirements of 326 IAC 8-2-9, since it was constructed in 2005, located in Huntington County, and has the unlimited PTE of VOC equal to or greater than fifteen (15) pounds per day, and this source performs miscellaneous metal surface coating under SIC code major group #37.

Pursuant to 326 IAC 8-2-9(c)(1), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of four and three-tenths (4.3) pounds of VOC per gallon of coating, excluding water, as delivered to a coating applicator that applies clear coatings.

Pursuant to 326 IAC 8-2-9(c)(2), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating that is not a clear coating, excluding water, as delivered to the applicator.

(b) The Wet Paint Booth (PB1) is also subject to the work practices specified under 326 IAC 8-2-9(f).
(c) 326 IAC 8-1-2 (Compliance Methods)
Pursuant to 326 IAC 8-1-2(a)(7), when using non-compliant coatings in the Wet Paint Booth (PB1), the source shall demonstrate compliance with the applicable 326 IAC 8-2-9 VOC content limitation(s), using a daily volume-weighted average of all coatings applied on a daily basis in the Wet Paint Booth (PB1).

Welding Operation

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), welding operations that consume less than 625 pounds of rod or wire per day are exempt from 326 IAC 6-3-2. Therefore, the welding operation is not subject to the requirements of 326 IAC 6-3-2.

Natural Gas-Fired Combustion

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.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Construction Date (Removal 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>Hot Water Power Wash Station (PWS-1)</td>
<td>2004</td>
<td>0.25</td>
<td>3.00</td>
<td>0.82</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Drying Oven (PCDOV)</td>
<td>2004</td>
<td>0.25</td>
<td>3.00</td>
<td>0.82</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Curing Oven (PCCOV)</td>
<td>2004</td>
<td>2.50</td>
<td>3.00</td>
<td>0.82</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Hot Water Power Wash Station (PWS-2)</td>
<td>2005</td>
<td>0.25</td>
<td>3.25</td>
<td>0.80</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>Facility</td>
<td>Construction Date (Removal Date)</td>
<td>Operating Capacity (MMBtu/hr)</td>
<td>Q (MMBtu/hr)</td>
<td>Calculated Pt (lb/MMBtu)</td>
<td>Particulate Limitation (Pt) (lb/MMBtu)</td>
<td>PM PTE based on AP-42 (lb/MMBtu)</td>
</tr>
<tr>
<td>------------------------------</td>
<td>---------------------------------</td>
<td>-----------------------------</td>
<td>-------------</td>
<td>-------------------------</td>
<td>-----------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>North Dry Off Oven (DOOVN)</td>
<td>2014</td>
<td>2.00</td>
<td>27.25</td>
<td>0.46</td>
<td>0.46</td>
<td>0.002</td>
</tr>
<tr>
<td>South Dry Off Oven (DOOVS)</td>
<td>2014</td>
<td>2.00</td>
<td>27.25</td>
<td>0.46</td>
<td>0.46</td>
<td>0.002</td>
</tr>
<tr>
<td>North Cure Oven (BKOVN)</td>
<td>2014</td>
<td>3.00</td>
<td>27.25</td>
<td>0.46</td>
<td>0.46</td>
<td>0.002</td>
</tr>
<tr>
<td>South Cure Oven (BKOVS)</td>
<td>2014</td>
<td>3.00</td>
<td>27.25</td>
<td>0.46</td>
<td>0.46</td>
<td>0.002</td>
</tr>
<tr>
<td>North Power Wash Water Heater (PWHN)</td>
<td>2014</td>
<td>3.50</td>
<td>27.25</td>
<td>0.46</td>
<td>0.46</td>
<td>0.002</td>
</tr>
<tr>
<td>South Power Wash Water Heater (PWHS)</td>
<td>2014</td>
<td>3.50</td>
<td>27.25</td>
<td>0.46</td>
<td>0.46</td>
<td>0.002</td>
</tr>
<tr>
<td>Three (3) Building Heat Make-Up Air Heaters (AMU-1, AMU-2, AMU-3)</td>
<td>2014</td>
<td>7.00</td>
<td>27.25</td>
<td>0.46</td>
<td>0.46</td>
<td>0.002</td>
</tr>
<tr>
<td>Evaporator/ Crystallizer (WWE)</td>
<td>2018</td>
<td>0.87</td>
<td>28.12</td>
<td>0.46</td>
<td>0.46</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)**

Liquid and gaseous fuels and combustion air are excluded from the definition of process weight as defined in 326 IAC 1-2-59(a). Therefore, these units are not subject to the requirements of 326 IAC 6-3-2.

**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 their 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 the source, 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 these units are 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

Permits issued under 326 IAC 2-8 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

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

Particulate

(1) In order to ensure compliance with the requirements of 326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD), the dust collector for PM, PM10, and PM2.5 control shall be in operation and control emissions from the Booth North – Building 2 and Booth South - Building 2 powder coating booths at all times the powder coating booths are in operation.

(2) In order to ensure compliance with the requirements of 326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD), and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the filter cartridge for PM, PM10, and PM2.5 control shall be in operation and control emissions from the Building 1 powder coating booth at all times the booth is in operation.

(3) In order to ensure compliance with the requirements of 326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD), the dust collector for PM, PM10, and PM2.5 control shall be in operation and control emissions from the two (2) shot blast units at all times the two (2) shot blast units are in operation.

VOC

(1) Compliance with the VOC content contained in 326 IAC 8-2-9 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 in 326 IAC 8-1-4.

(2) When using non-compliant coatings in the Wet Paint Booth (PB1), to determine compliance with the VOC content limit in 326 IAC 8-2-9, the daily volume weighted average of coatings shall be calculated.

Pursuant to 326 IAC 8-1-2(a)(7), the volume weighted average of coatings shall be determined by the following equation:

\[
A = \left[ \frac{\sum (c \times U)}{\sum U} \right]
\]

Where:

- A is the volume weighted average in pounds VOC per gallon less water as applied;
- C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
- U is the usage rate of the coating in gallons per day.

**Testing Requirements:**

(1) IDEM OAQ has determined that testing of the dust collectors and filter cartridge is not required at this time to determine compliance with the PM, PM10, PM2.5 emission limits. IDEM has determined that the source is able to demonstrate compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) emission limits by maintaining a conservative control efficiency of 75%.

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating - Building 1 &amp; Building 2 (Cartridge Filter &amp; Dust Collectors)</td>
<td>Baghouse Inspections</td>
<td>Quarterly</td>
<td>Normal - Abnormal</td>
</tr>
<tr>
<td>Shot Blasting - Building 2 (Dust Collectors)</td>
<td>Dry Filter Inspections</td>
<td>Daily</td>
<td>Verify the placement, integrity and particle loading of the filters</td>
</tr>
<tr>
<td>Wet Paint Booth (PB1) Dry Filters</td>
<td>Observations for stack overspray</td>
<td>Weekly</td>
<td>Verify if there is an overspray condition that should result in a response</td>
</tr>
<tr>
<td></td>
<td>Inspections for stack emissions and presence of overspray</td>
<td>Monthly</td>
<td>Verify if there is a noticeable change in overspray emissions or evidence of overspray</td>
</tr>
</tbody>
</table>

(1) These monitoring conditions are necessary because the cartridge filter and dust collectors for the Powder Coating Operations in Building 1 & Building 2 must operate properly to assure compliance with 326 IAC 2-8-4 (FESOP) and of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) requirements.
(2) These monitoring conditions are necessary because the dust collectors for Shot Blasting Operations in Building 2 must operate properly to assure compliance with 326 IAC 2-8-4 (FESOP) and of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) requirements.

(3) These monitoring conditions are necessary because the dry filters for the Wet Paint Booth (PB1) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes) requirements.

Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes were made to conditions contained previously issued permits/approvals (these changes may include Title I changes):

(1) Condition C.7 Stack Height [326 IAC 1-7] has been removed from the permit because emission units exhaust indoors.

(2) Condition C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] has been removed from the permit because the limited PTE is less than 100 tons per year so this does not apply to the source.

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 May 1, 2019.

The operation of this stationary trailer manufacturing plant shall be subject to the conditions of the attached proposed FESOP Renewal No. 069-41412-00066.

The staff recommends to the Commissioner that the FESOP Renewal be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Michaela Hecox, 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) 233-3031 or (800) 451-6027, and ask for Michaela Hecox or (317) 233-3031.

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

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

## Summary of PTE

**Company Name:** Novae Corporation  
**Address City IN Zip:** 1 Novae Parkway, Markle, IN 46770  
**Permit Number:** 069-41412-00066  
**Reviewer:** Michaela Hecox  
**Date:** October 29, 2019

### Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5*</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating</td>
<td>179.58</td>
<td>179.58</td>
<td>179.58</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Shot Blasting</td>
<td>124.11</td>
<td>106.73</td>
<td>106.73</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Welding</td>
<td>7.53</td>
<td>7.53</td>
<td>7.53</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.68</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.23</td>
<td>0.92</td>
<td>0.92</td>
<td>0.07</td>
<td>12.07</td>
<td>0.66</td>
<td>10.14</td>
<td>0.23</td>
</tr>
<tr>
<td><strong>Total Excluding Fugitives</strong></td>
<td><strong>318.83</strong></td>
<td><strong>302.15</strong></td>
<td><strong>302.15</strong></td>
<td><strong>0.07</strong></td>
<td><strong>12.07</strong></td>
<td><strong>13.83</strong></td>
<td><strong>10.14</strong></td>
<td><strong>3.72</strong></td>
</tr>
</tbody>
</table>

### Fugitive Emissions

| Paved/Unpaved Roads | 2.24 | 0.55 | 0.06 | -   | -   | -   | -   | -         |
| **Total Fugitives** | **2.24** | **0.55** | **0.06** | -   | -   | -   | -   | -         |

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5*</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating</td>
<td>44.90</td>
<td>44.90</td>
<td>44.90</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Shot Blasting</td>
<td>31.03</td>
<td>26.68</td>
<td>26.68</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Wet Paint Booth</td>
<td>0.37</td>
<td>0.37</td>
<td>0.37</td>
<td>-</td>
<td>-</td>
<td>13.17</td>
<td>-</td>
<td>2.81</td>
</tr>
<tr>
<td>Welding</td>
<td>7.53</td>
<td>7.53</td>
<td>7.53</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.68</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.23</td>
<td>0.92</td>
<td>0.92</td>
<td>0.07</td>
<td>12.07</td>
<td>0.66</td>
<td>10.14</td>
<td>0.23</td>
</tr>
<tr>
<td><strong>Total Excluding Fugitives</strong></td>
<td><strong>84.05</strong></td>
<td><strong>80.39</strong></td>
<td><strong>80.39</strong></td>
<td><strong>0.07</strong></td>
<td><strong>12.07</strong></td>
<td><strong>13.83</strong></td>
<td><strong>10.14</strong></td>
<td><strong>3.72</strong></td>
</tr>
</tbody>
</table>

### Fugitive Emissions

| Paved/Unpaved Roads | 2.24 | 0.55 | 0.06 | -   | -   | -   | -   | -         |
| **Total Fugitives** | **2.24** | **0.55** | **0.06** | -   | -   | -   | -   | -         |

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5*</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating</td>
<td>44.94</td>
<td>44.94</td>
<td>44.94</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Shot Blasting</td>
<td>31.01</td>
<td>31.01</td>
<td>31.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Wet Paint Booth</td>
<td>0.37</td>
<td>0.37</td>
<td>0.37</td>
<td>-</td>
<td>-</td>
<td>13.17</td>
<td>-</td>
<td>2.81</td>
</tr>
<tr>
<td>Welding</td>
<td>7.53</td>
<td>7.53</td>
<td>7.53</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.68</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.23</td>
<td>0.92</td>
<td>0.92</td>
<td>0.07</td>
<td>12.07</td>
<td>0.66</td>
<td>10.14</td>
<td>0.23</td>
</tr>
<tr>
<td><strong>Total Excluding Fugitives</strong></td>
<td><strong>84.08</strong></td>
<td><strong>84.76</strong></td>
<td><strong>84.76</strong></td>
<td><strong>0.07</strong></td>
<td><strong>12.07</strong></td>
<td><strong>13.83</strong></td>
<td><strong>10.14</strong></td>
<td><strong>3.72</strong></td>
</tr>
</tbody>
</table>

### Fugitive Emissions

| Paved/Unpaved Roads | 2.24 | 0.55 | 0.06 | -   | -   | -   | -   | -         |
| **Total Fugitives** | **2.24** | **0.55** | **0.06** | -   | -   | -   | -   | -         |

*PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.
Appendix A: Emissions Calculations
Powder Coating Operation

Company Name: Novae Corporation
Address City IN Zip: 1 Novae Parkway, Markle, IN 46770
Permit Number: 069-41412-00066
Reviewer: Michaela Hecox
Date: October 29, 2019

<table>
<thead>
<tr>
<th>Materials</th>
<th>Maximum Coating Usage (lbs/unit)</th>
<th>Maximum Units per Hour</th>
<th>Transfer Efficiency (%)</th>
<th>Uncontrolled Particulate (lbs/hr)</th>
<th>Uncontrolled Particulate (tons/yr)*</th>
<th>Cartridge Filter Control Efficiency (%)</th>
<th>Potential Particulate (lbs/hr)</th>
<th>Controlled Particulate (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating - Building One</td>
<td>8</td>
<td>8</td>
<td>75.00%</td>
<td>16.00</td>
<td>70.08</td>
<td>75.0%</td>
<td>4.00</td>
<td>17.52</td>
</tr>
<tr>
<td>Powder Coating Booth North - Building 2</td>
<td>25</td>
<td>2</td>
<td>75.00%</td>
<td>12.50</td>
<td>54.75</td>
<td>75.0%</td>
<td>3.13</td>
<td>13.69</td>
</tr>
<tr>
<td>Powder Coating Booth South - Building 2</td>
<td>25</td>
<td>2</td>
<td>75.00%</td>
<td>12.50</td>
<td>54.75</td>
<td>75.0%</td>
<td>3.13</td>
<td>13.69</td>
</tr>
<tr>
<td>Total</td>
<td>88</td>
<td>12</td>
<td>41.00</td>
<td>179.58</td>
<td>10.25</td>
<td>44.90</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* PM=PM10=PM2.5

Methodology
Uncontrolled Particulate (lbs/hr) = Maximum Usage (lbs/hr) * Transfer Efficiency (%)
Uncontrolled Particulate (tons/yr) = Maximum Usage (lbs/hr) * Transfer Efficiency (%) * 8760 (hrs/yr) * 1/2000 (ton/lbs)
Potential Particulate (lbs/hr) = Uncontrolled Particulate (lbs/hr) * (1- % Control Efficiency)
Potential Particulate (lbs/hr) = Uncontrolled Particulate (lbs/hr) * (1- % Control Efficiency) * 8760 (hrs/yr) * 1/2000 (ton/lbs)
Appendix A: Emission Calculations
Abrasive Blasting - Confined

Company Name: Novae Corporation
Address City IN Zip: 1 Novae Parkway, Markle, IN 46770
Permit Number: 069-41412-00066
Reviewer: Michaela Hecox
Date: October 29, 2019

Emission Factors for Abrasives

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

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al oxides</td>
<td>160</td>
</tr>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
</tr>
</tbody>
</table>

Density of Abrasives (lb/ft³)

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

<table>
<thead>
<tr>
<th>Nozzle Pressure (psig)</th>
<th>30</th>
<th>40</th>
<th>50</th>
<th>60</th>
<th>70</th>
<th>80</th>
<th>90</th>
<th>100</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/8</td>
<td>28</td>
<td>35</td>
<td>42</td>
<td>49</td>
<td>55</td>
<td>63</td>
<td>70</td>
<td>77</td>
</tr>
<tr>
<td>3/16</td>
<td>65</td>
<td>80</td>
<td>94</td>
<td>107</td>
<td>122</td>
<td>135</td>
<td>149</td>
<td>165</td>
</tr>
<tr>
<td>1/4</td>
<td>109</td>
<td>138</td>
<td>168</td>
<td>195</td>
<td>221</td>
<td>255</td>
<td>280</td>
<td>309</td>
</tr>
<tr>
<td>5/16</td>
<td>206</td>
<td>247</td>
<td>292</td>
<td>354</td>
<td>377</td>
<td>420</td>
<td>462</td>
<td>507</td>
</tr>
<tr>
<td>3/8</td>
<td>285</td>
<td>355</td>
<td>417</td>
<td>477</td>
<td>540</td>
<td>600</td>
<td>657</td>
<td>720</td>
</tr>
<tr>
<td>7/16</td>
<td>385</td>
<td>472</td>
<td>560</td>
<td>645</td>
<td>755</td>
<td>820</td>
<td>905</td>
<td>940</td>
</tr>
<tr>
<td>1/2</td>
<td>503</td>
<td>615</td>
<td>725</td>
<td>835</td>
<td>945</td>
<td>1050</td>
<td>1160</td>
<td>1265</td>
</tr>
<tr>
<td>5/8</td>
<td>820</td>
<td>990</td>
<td>1170</td>
<td>1336</td>
<td>1510</td>
<td>1680</td>
<td>1850</td>
<td>2030</td>
</tr>
<tr>
<td>3/4</td>
<td>1140</td>
<td>1420</td>
<td>1670</td>
<td>1915</td>
<td>2160</td>
<td>2400</td>
<td>2630</td>
<td>2880</td>
</tr>
<tr>
<td>1</td>
<td>2030</td>
<td>2460</td>
<td>2900</td>
<td>3340</td>
<td>3780</td>
<td>4200</td>
<td>4640</td>
<td>5060</td>
</tr>
</tbody>
</table>

Calculations

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 = 720
D = Density of abrasive (lb/ft³) From Table 2 = 487
D1 = Density of sand (lb/ft³) = 99
ID = Actual nozzle internal diameter (in) = 0.375
ID1 = Nozzle internal diameter (in) from Table 3 = 0.375

Flow Rate (FR) (lb/hr) = 3541.818 per nozzle

Uncontrolled Emissions (E, lb/hr)

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10/PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.004</td>
<td>0.003</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Flow Rate (FR) (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
</tr>
<tr>
<td>2</td>
</tr>
</tbody>
</table>

Uncontrolled Emissions* = 28.33 lb/hr
Controlled Emissions* = 7.08 lb/hr

Control Efficiency = 75%

Uncontrolled Emissions* = 24.37 lb/hr
Controlled Emissions* = 6.09 lb/hr

Uncontrolled Emissions* = 124.11 ton/yr
Controlled Emissions* = 26.68 ton/yr

METHODOLOGY
PM10/PM2.5 Emission Factor = lb PM / lb abrasive (Table 1) x lb PM10 / lb PM (Table 1)
Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)
E = EF x FR x (1-w/200) x N
w should be entered in as a whole number (if w is 50%, enter 50)
# Appendix A: Emissions Calculations

## VOC and Particulate

### From Surface Coating Operations

### Wet Paint Booth 1 (PB1)

**Company Name:** Novae Corporation  
**Address City In Zip:** 1 Novae Parkway, Markle, IN 46770  
**Permit Number:** 069-41412-00066  
**Reviewer:** Michaela Hecox  
**Date:** October 29, 2019

### Material Breakdown

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H20 &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/day)</th>
<th>Pounds VOC per gallon of coating</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Potential VOC (pounds/day)</th>
<th>Potential VOC (ton/yr)</th>
<th>Particulate Potential (pounds/hour)</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primer - SW CC-A28</td>
<td>11.7</td>
<td>28.30%</td>
<td>0.0%</td>
<td>28.3%</td>
<td>0.0%</td>
<td>53.00%</td>
<td>1.10000</td>
<td>8.000</td>
<td>3.32</td>
<td>3.32</td>
<td>29.21</td>
<td>5.33</td>
<td>1.08</td>
<td>4.73</td>
<td>6.26</td>
<td>65%</td>
</tr>
<tr>
<td>Cleaning Solvent - MAK</td>
<td>6.8</td>
<td>100.00%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00%</td>
<td>1.00000</td>
<td>0.000</td>
<td>6.75</td>
<td>6.75</td>
<td>6.75</td>
<td>1.23</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
</tr>
<tr>
<td>Topcoat - SW CC-B21</td>
<td>8.1</td>
<td>41.40%</td>
<td>0.0%</td>
<td>41.4%</td>
<td>0.0%</td>
<td>54.00%</td>
<td>1.10000</td>
<td>8.000</td>
<td>3.35</td>
<td>3.35</td>
<td>29.44</td>
<td>5.37</td>
<td>0.61</td>
<td>2.66</td>
<td>6.19</td>
<td>65%</td>
</tr>
<tr>
<td>Cleaning Solvent - MAK</td>
<td>6.8</td>
<td>100.00%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00%</td>
<td>1.00000</td>
<td>0.000</td>
<td>6.75</td>
<td>6.75</td>
<td>6.75</td>
<td>1.23</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
</tr>
</tbody>
</table>

### State Potential Emissions

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H20 &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/day)</th>
<th>Pounds VOC per gallon of coating</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Potential VOC (pounds/day)</th>
<th>Potential VOC (ton/yr)</th>
<th>Particulate Potential (pounds/hour)</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primer - SW CC-A28</td>
<td>11.7</td>
<td>28.30%</td>
<td>0.0%</td>
<td>28.3%</td>
<td>0.0%</td>
<td>53.00%</td>
<td>1.10000</td>
<td>8.000</td>
<td>3.32</td>
<td>3.32</td>
<td>29.21</td>
<td>5.33</td>
<td>1.08</td>
<td>4.73</td>
<td>6.26</td>
<td>65%</td>
</tr>
<tr>
<td>Cleaning Solvent - MAK</td>
<td>6.8</td>
<td>100.00%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00%</td>
<td>1.00000</td>
<td>0.000</td>
<td>6.75</td>
<td>6.75</td>
<td>6.75</td>
<td>1.23</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
</tr>
<tr>
<td>Topcoat - SW CC-B21</td>
<td>8.1</td>
<td>41.40%</td>
<td>0.0%</td>
<td>41.4%</td>
<td>0.0%</td>
<td>54.00%</td>
<td>1.10000</td>
<td>8.000</td>
<td>3.35</td>
<td>3.35</td>
<td>29.44</td>
<td>5.37</td>
<td>0.61</td>
<td>2.66</td>
<td>6.19</td>
<td>65%</td>
</tr>
<tr>
<td>Cleaning Solvent - MAK</td>
<td>6.8</td>
<td>100.00%</td>
<td>0.0%</td>
<td>100.0%</td>
<td>0.0%</td>
<td>0.00%</td>
<td>1.00000</td>
<td>0.000</td>
<td>6.75</td>
<td>6.75</td>
<td>6.75</td>
<td>1.23</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>100%</td>
</tr>
</tbody>
</table>

### Methodology

- **Pounds of VOC per Gallon Coating less Water** = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- **Pounds of VOC per Gallon Coating** = (Density (lb/gal) * Weight % Organics)
- **Potential VOC Pounds per Day** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- **Potential VOC Tons per Year** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/day) * (365 days/yr) * (1 ton/2000 lbs)
- **Particulate Potential Tons per Year** = (g/day * (lbs/gal) * (1 - Weight % Volatiles) * (1-Transfer efficiency) * (365 days/yr)) * (1 ton/2000 lbs)
- **Pounds VOC per Gallon of Solids** = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- **Total** = Worst Coating + Sum of all solvents used

The unit/day maximum production accounted for both primer and topcoat being applied in a day.
### Company Name: Novae Corporation
### Address City IN Zip: 1 Novae Parkway, Markle, IN 46770
### Permit Number: 069-41412-00066
### Reviewer: Michaela Hecox
### Date: October 29, 2019

#### Material Density

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/day)</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Weight %</th>
<th>Ethyl Benzene Emissions (ton/yr)</th>
<th>MIBK Emissions (ton/yr)</th>
<th>Styrene Emissions (ton/yr)</th>
<th>Glycol Ether Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primer -SW CC-A28</td>
<td>11.7</td>
<td>1.100000</td>
<td>8.00</td>
<td>0.10%</td>
<td>10.00%</td>
<td>0.00%</td>
<td>0.02</td>
<td>1.88</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Topcoat-SW-CC-B21</td>
<td>8.1</td>
<td>1.100000</td>
<td>8.00</td>
<td>0.00%</td>
<td>0.00%</td>
<td>3.00%</td>
<td>4.00%</td>
<td>0.00</td>
<td>0.39</td>
<td>0.52</td>
</tr>
</tbody>
</table>

**Total State Potential Emissions:**

|                        | 0.02 | 1.88 | 0.39 | 0.52 |

**METHODODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/day) * Weight % HAP * 365 days/yr
### Appendix A: Emissions Calculations

#### Welding and Thermal Cutting

**Company Name:** Novae Corporation  
**Address City IN Zip:** 1 Novae Parkway, Markle, IN 46770  
**Permit Number:** 069-41412-00066  
**Reviewer:** Michaela Hecox  
**Date:** October 29, 2019

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/hr)</th>
<th>EMISSION FACTORS* (lb pollutant/lb electrode)</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM = PM10 Mn Ni Co Cr</td>
<td>PM = PM10 Mn Ni Co Cr</td>
<td></td>
</tr>
<tr>
<td>Submerged Arc</td>
<td>0</td>
<td>0.0012</td>
<td>0.036 0.110</td>
<td>0.000 0.000 0.000</td>
<td>0</td>
</tr>
<tr>
<td>Metal Inert Gas (MIG)(carbon steel)</td>
<td>25</td>
<td>12.5</td>
<td>0.0055 0.0005</td>
<td>1.719 0.156 0.000</td>
<td>0</td>
</tr>
<tr>
<td>Stick (E7018 electrode)</td>
<td>0</td>
<td>113.7</td>
<td>0.0211 0.000</td>
<td>0.000 0.000 0.000</td>
<td>0</td>
</tr>
<tr>
<td>Tungsten Inert Gas (TIG)(carbon steel)</td>
<td>0</td>
<td>113.7</td>
<td>0.0055 0.0005</td>
<td>0.000 0.000 0.000</td>
<td>0</td>
</tr>
<tr>
<td>Oxyacetylene(carbon steel)</td>
<td>0</td>
<td>113.7</td>
<td>0.0055 0.0005</td>
<td>0.000 0.000 0.000</td>
<td>0</td>
</tr>
<tr>
<td>Gas Tungsten Arc Welding (GTAW)*1</td>
<td>0</td>
<td>0.0012</td>
<td>0.0810 0.01 0.13</td>
<td>0.000 0.000 0.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Gas Tungsten Arc Welding (GTAW)*1</td>
<td>0</td>
<td>0.0012</td>
<td>0.0810 0.01 0.13</td>
<td>0.000 0.000 0.000</td>
<td>0.000</td>
</tr>
</tbody>
</table>

**Flame Cutting**

<table>
<thead>
<tr>
<th>Number of Stations</th>
<th>Max. Metal Thickness Cut (in.)</th>
<th>Max. Metal Cutting Rate (in./minute)</th>
<th>EMISSION FACTORS* (lb pollutant/1,000 inches cut, 1&quot; thick)**</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM = PM10 Mn Ni Co Cr</td>
<td>PM = PM10 Mn Ni Co Cr</td>
<td></td>
</tr>
<tr>
<td>Oxyacetylene</td>
<td>0</td>
<td>0.1622</td>
<td>0.0005 0.0001</td>
<td>0.000 0.000 0.000</td>
<td>0</td>
</tr>
<tr>
<td>Oxymethane</td>
<td>0</td>
<td>0.0815</td>
<td>0.0002 0.0002</td>
<td>0.000 0.000 0.000</td>
<td>0</td>
</tr>
<tr>
<td>Plasma**</td>
<td>0</td>
<td>0.0039</td>
<td>0.000 0.000</td>
<td>0.000 0.000 0.000</td>
<td>0</td>
</tr>
</tbody>
</table>

**Emission Totals**

- Potential Emissions lbs/hr: 1.72  
- Potential Emissions lbs/day: 41.25  
- Potential Emissions tons/year: 7.53

**Methodology:**

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./minute)(60 min/hr)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./minute)(60 min/hr)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr)(station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/hr = emissions, lbs/hr x 1000 lbs/hr

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
## Appendix A: Emissions Calculations

### Natural Gas Combustion Only

**Company Name:** Novae Corporation  
**Address City IN Zip:** 1 Novae Parkway, Markle, IN 46770  
**Permit Number:** 069-41413-00066  
**Reviewer:** Michaela Hecox  
**Date:** October 29, 2019

<table>
<thead>
<tr>
<th>Building</th>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Total MMBtu/hour</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Hot Water Power Wash Station</td>
<td>PWS-1</td>
<td>0.25</td>
</tr>
<tr>
<td>1</td>
<td>Hot Water Power Wash Station</td>
<td>PWS-2</td>
<td>0.25</td>
</tr>
<tr>
<td>1</td>
<td>Drying Oven</td>
<td>PCDOV</td>
<td>0.25</td>
</tr>
<tr>
<td>1</td>
<td>Curing Oven</td>
<td>PCCOV</td>
<td>2.50</td>
</tr>
<tr>
<td>2</td>
<td>North Dry Off Oven</td>
<td>DDOV/N</td>
<td>2.00</td>
</tr>
<tr>
<td>2</td>
<td>South Dry Off Oven</td>
<td>DDOV/S</td>
<td>2.00</td>
</tr>
<tr>
<td>2</td>
<td>North Cure Oven</td>
<td>BKOVN</td>
<td>3.00</td>
</tr>
<tr>
<td>2</td>
<td>South Cure Oven</td>
<td>BKOVS</td>
<td>3.00</td>
</tr>
<tr>
<td>2</td>
<td>North Power Wash Water Heater</td>
<td>PWHN</td>
<td>3.50</td>
</tr>
<tr>
<td>2</td>
<td>South Power Wash Water Heater</td>
<td>PWHS</td>
<td>3.50</td>
</tr>
<tr>
<td>2</td>
<td>Three (3) Building Heat Make-up Air Heaters</td>
<td>AMU-1, AMU-2, AMU-3</td>
<td>7.00</td>
</tr>
<tr>
<td>1</td>
<td>Evaporator/ Crystallizer</td>
<td>WWE</td>
<td>0.87</td>
</tr>
</tbody>
</table>

**TOTAL** 28.12

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.23</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.92</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.92</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.07</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>12.07</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.66</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>10.14</td>
</tr>
</tbody>
</table>

**Methodology**

All emission factors are based on normal firing.  
MMBu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Potential Throughput (MMCF) = 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  

**HAPS Calculations**

### HAPS - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.536E-04</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.446E-04</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>9.056E-03</td>
</tr>
<tr>
<td>Hexane</td>
<td>2.173E-01</td>
</tr>
<tr>
<td>Toluene</td>
<td>4.105E-04</td>
</tr>
<tr>
<td><strong>Total - Organics</strong></td>
<td><strong>2.272E-01</strong></td>
</tr>
</tbody>
</table>

### HAPS - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>6.037E-05</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.328E-04</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.690E-04</td>
</tr>
<tr>
<td>Manganese</td>
<td>4.588E-05</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.536E-04</td>
</tr>
<tr>
<td><strong>Total Metals</strong></td>
<td><strong>6.617E-04</strong></td>
</tr>
<tr>
<td><strong>Worst HAP</strong></td>
<td><strong>2.279E-01</strong></td>
</tr>
</tbody>
</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 is the same as above.  
The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emission Calculations

Fugitive Dust Emissions - Paved Roads

Company Name: Novae Corporation
Address: 1 Novae Parkway, Markle, IN 46770
Permit Number: 069-41412-00066
Reviewer: Michaela Hecox
Date: October 29, 2019

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 (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 day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip) - Purchased Materials</td>
<td>2.0</td>
<td>1.0</td>
<td>2.0</td>
<td>35.0</td>
<td>70.0</td>
<td>500</td>
<td>0.085</td>
<td>0.2</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip) - Empty</td>
<td>2.0</td>
<td>1.0</td>
<td>2.0</td>
<td>10.0</td>
<td>20.0</td>
<td>500</td>
<td>0.085</td>
<td>0.2</td>
</tr>
<tr>
<td>Vehicle (entering plant) (one-way trip) - Empty</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>7.5</td>
<td>90.0</td>
<td>150</td>
<td>0.028</td>
<td>0.3</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip) - Manufactured Trailers</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>25.0</td>
<td>300.0</td>
<td>150</td>
<td>0.028</td>
<td>0.3</td>
</tr>
</tbody>
</table>

Totals | 28.0 | 480.0 | 1.1 | 387.1 |

Average Vehicle Weight Per Trip = \( \frac{17.1 \text{ tons/trip}}{0.04 \text{ miles/trip}} \)

Average Miles Per Trip = 0.04 miles/trip

Unmitigated Emission Factor, \( \text{Ef} \) = \( k \cdot (sL)^{0.91} \cdot (W)^{1.02} \) (Equation 1 from AP-42 13.2.1)

where \( k = 0.011 \), \( 0.0022 \), \( 0.00054 \) lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
\( W = 17.1 \), 17.1, 17.1 tons = average vehicle weight (provided by source)
\( sL = 9.7 \), 9.7, 9.7

Mitigated Emission Factor, \( \text{Eext} = \text{Ef} \cdot \left(1 - \frac{p}{4N}\right) \) (Equation 2 from AP-42 13.2.1)

where \( p = 125 \text{ days of rain greater than or equal to 0.01 inches} \) (see Fig. 13.2.1-2)
\( N = 365 \text{ days per year} \)

Unmitigated Emission Factor, \( \text{Ef} = \frac{\text{Unmitigated PTE of PM}}{\text{Maximum one-way miles (miles/day)}} \times 0.01 \) lb/mile

Mitigated Emission Factor, \( \text{Eext} = \frac{\text{Mitigated PTE of PM}}{\text{Maximum one-way miles (miles/day)}} \times 0.01 \) lb/mile

Dust Control Efficiency = 0% 0% 0% (pursuant to control measures outlined in fugitive dust control plan)

Methodology

Total Weight driven per day (ton/day) = \( \text{Maximum Weight Loaded (tons/trip)} \times \text{[Maximum trips per day (trip/day)]} \)
Maximum one-way distance (miles/day) = \( \text{Maximum one-way distance (feet/trip)} / 5280 \text{ ft/mile} \)
Average Vehicle Weight Per Trip (ton/trip) = \( \text{Maximum one-way trips per year (trip/day)} \times \text{[Maximum one-way distance (miles/trip)]} \)
Average Miles Per Trip (miles/trip) = \( \text{SUM}[\text{Total Weight driven per day (ton/day)}] / \text{SUM}[\text{Maximum trips per day (trip/day)}] \)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit
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 per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Total Weight Loaded (ton/trip)</th>
<th>Maximum one-way distance (ft/trip)</th>
<th>Average Vehicle Weight Per Trip</th>
<th>Average Miles Per Trip</th>
<th>Unmitigated Emission Factor, EF</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip) - empty</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>7.5</td>
<td>90.0</td>
<td>650</td>
<td>0.123</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip) - Manufactured Trailers</td>
<td>12.0</td>
<td>1.0</td>
<td>12.0</td>
<td>25.0</td>
<td>300.0</td>
<td>650</td>
<td>0.123</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>24.0</strong></td>
<td><strong>390.0</strong></td>
<td><strong>3.0</strong></td>
<td><strong>1078.4</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Average Vehicle Weight Per Trip** = 15.3 tons/trip

**Average Miles Per Trip** = 0.12 miles/trip

**Unmitigated Emission Factor, EF** = $k\times[(s/12)^a]\times[(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

- where $k = 4.9$ PM, 1.5 PM2.5, 0.15 lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial/Roads)
- $s = 4.8$ PM, 4.8 PM2.5, 4.8 % = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
- $a = 0.7$ PM, 0.9 PM2.5, 0.9 = constant (AP-42 Table 13.2.2-2 for Industrial Roads)
- $W = 16.3$ tons = average vehicle weight (provided by source)
- $b = 0.45$ PM, 0.45 PM2.5, 0.45 = constant (AP-42 Table 13.2.2-2 for Industrial/Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = EF * [(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)

**Mitigated Emission Factor, Eext** = $E\times[(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

**Dust Control Efficiency** = 0% PM, 0% PM2.5, 0% (pursuant to control measures outlined in fugitive dust control plan)

### Process Information

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Unmitigated PTE of PM10 (tons/yr)</th>
<th>Unmitigated PTE of PM2.5 (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM (tons/yr)</th>
<th>Controlled PTE of PM10 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip) - empty</td>
<td>1.49</td>
<td>0.38</td>
<td>0.04</td>
<td>0.98</td>
<td>0.25</td>
<td>0.02</td>
<td>0.98</td>
<td>0.25</td>
<td>0.02</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip) - Manufactured Trailers</td>
<td>1.49</td>
<td>0.38</td>
<td>0.04</td>
<td>0.98</td>
<td>0.25</td>
<td>0.02</td>
<td>0.98</td>
<td>0.25</td>
<td>0.02</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>2.98</strong></td>
<td><strong>0.76</strong></td>
<td><strong>0.08</strong></td>
<td><strong>1.96</strong></td>
<td><strong>0.50</strong></td>
<td><strong>0.05</strong></td>
<td><strong>1.96</strong></td>
<td><strong>0.50</strong></td>
<td><strong>0.05</strong></td>
</tr>
</tbody>
</table>

**Methodology**

- Total Weight driven per day (ton/day) = (Maximum Weight Loaded (ton/trip)) \* (Maximum trips per day (trip/day))
- Maximum one-way miles (mi/day) = (Maximum one-way distance (ft/trip)) / 5280 ft/mile
- Average Vehicle Weight Per Trip = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
- Average Miles Per Trip = SUM[Maximum one-way miles (mi/day)] / SUM[Maximum trips per year (trip/day)]

**Abbreviations**

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit
Emission Calculations
326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Company Name: Novae Corporation
Address City IN Zip: 1 Novae Parkway, Markle, IN 46770
Permit Number: 069-41412-00066
Reviewer: Michaela Hecox
Date: October 29, 2019

Indirect Heating Units Which Began Operation After September 21, 1983

<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>PWS 1</td>
<td>2005</td>
<td>0.25</td>
<td>0.50</td>
<td>1.31</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>PWS 2</td>
<td>2005</td>
<td>0.25</td>
<td>0.50</td>
<td>1.31</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>PWHN</td>
<td>2014</td>
<td>3.50</td>
<td>7.50</td>
<td>0.65</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>PWHS</td>
<td>2014</td>
<td>3.50</td>
<td>7.50</td>
<td>0.65</td>
<td>0.6</td>
<td>0.002</td>
</tr>
<tr>
<td>WWE</td>
<td>2018</td>
<td>0.87</td>
<td>8.37</td>
<td>0.63</td>
<td>0.6</td>
<td>0.002</td>
</tr>
</tbody>
</table>

Methodology
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.
November 22, 2019

Randy Hinojosa
Novae Corporation
6 Novae Pkwy
Markle, IN 46770

Re: Public Notice
Novae Corporation
Permit Level: FESOP Renewal
Permit Number: 069-41412-00066

Dear Randy Hinojosa:

Enclosed is a copy of your draft FESOP Renewal, 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 Markle Public Library, 155 West Sparks, P.O. Box 519 in Markle IN 46770-0519. 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 Michaela Hecox, 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 3-3031 or dial (317) 233-3031.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
November 22, 2019

To: Markle Public Library 155 West Sparks, P.O. Box 519 Markle IN 46770-0519 (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:** Novae Corporation
**Permit Number:** 069-41412-00066

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

November 22, 2019
Novae Corporation
069-41412-00066

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](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
<table>
<thead>
<tr>
<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Randy Hinojosa Novae Corporation 6 Novae Pkwy Markle IN 46770 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Steve Bermes Novae Corporation 1 Novae Pkwy Markle IN 46770 (RO CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td>Huntington County Board of Commissioners 201 N. Jefferson Street Huntington IN 46750 (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td>Frederick &amp; Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td>Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td>Markle Public Library 155 West Sparks, P.O. Box 519 Markle IN 46770-0519 (Library)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td>Huntington County Health Department 1330 S Jefferson Street Huntington IN 46750 (Health Department)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td>Melvin &amp; Deborah Gillespie 5616 N 200 E Huntington IN 46750 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td>Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.