NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Federally Enforceable State Operating Permit (FESOP)
for Hoosier Metal Polish in Newton County

FESOP Renewal No.: F111-41715-00029

The Indiana Department of Environmental Management (IDEM) has received an application from Hoosier Metal Polish located at 304 North Fairground Road, Kentland, Indiana 47951 for a renewal of its FESOP issued on April 24, 2015. If approved by IDEM’s Office of Air Quality (OAQ), this proposed renewal would allow Hoosier Metal Polish to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

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

Kentland Public Library
201 E Graham St
Kentland, IN 47951

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 F111-41715-00029 in all correspondence.
Comments should be sent to:

Alexandrea Neuzerling
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Alexandrea Neuzerling or (317) 232-6634
Or dial directly: (317) 232-6634
Fax: (317) 232-6749 attn: Alexandrea Neuzerling
E-mail: ANeuzerl@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, 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 Alexandrea Neuzerling of my staff at the above address.

Iryn Calliung, Section Chief
Permits Branch
Office of Air Quality
Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Hoosier Metal Polish
304 North Fairground Road
Kentland, Indiana 47951

(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.: F111-41715-00029
Master Agency Interest ID: 52334

<table>
<thead>
<tr>
<th>Issued by:</th>
<th>Issuance Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iryn Calilung, Section Chief</td>
<td></td>
</tr>
<tr>
<td>Permits Branch</td>
<td></td>
</tr>
<tr>
<td>Office of Air Quality</td>
<td></td>
</tr>
</tbody>
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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary reinforced plastic parts manufacturing plant, which will primarily produce plastic tanks and fenders for lawn care tractors.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>304 North Fairground Road, Kentland, Indiana 47951</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(219) 474-6011</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3089 (Plastics Products, Not Elsewhere Classified)</td>
</tr>
<tr>
<td></td>
<td>3524 (Lawn and Garden Tractors and Home Lawn and Garden Equipment)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Newton</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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

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

(a) One (1) resin transfer molding applicator, identified as RTM-1, constructed in 2015, with a maximum capacity of 7.5 pounds of resin per hour, uncontrolled, and exhausting indoors.

(b) One (1) open molding gel coat booth, identified as G-01, constructed in 2015, applying gel coats using air-atomized spray guns, with a maximum capacity of 2.5 gallons of gel coat per minute, using dry filters for particulate control, and exhausting to stack PB-1.

(c) One (1) tooling gel coat applicator, identified as TG-01, constructed in 2015, applying tooling gel coat to molds in the open molding gel coat booth using an air-atomized spray gun, with a maximum capacity of 500 pounds of tooling gel coat per year, using dry filters for particulate control, and exhausting to stack PB-1.

(d) One (1) fiberglass layup area, identified as FIT-01, constructed in 2015, applying resins and glass using fluid impingement technology (FIT), with a maximum capacity of 2.5 gallons of resin per minute, using dry filters for particulate control, and exhausting to stack LU-1 and LU-2.

(e) One (1) resin reinforcement process, identified as T-01, constructed 2015, applying resin using a brush in the fiberglass layup area, uncontrolled, and exhausting to stack LU-1 and LU-2.

(f) One (1) tooling resin applicator, identified as TR-1, constructed in 2015, applying tooling resin to molds in the fiberglass layup area using fluid impingement technology (FIT), with a maximum capacity of 500 pounds of tooling resin per year, using dry filters for particulate control, and exhausting to stack LU-1 and LU-2.
(g) One (1) glue gun, identified as GG-1, constructed in 2015, applying adhesive to reinforced plastic tanks, with a maximum capacity of 8 tanks per hour, uncontrolled, and exhausting to stacks LU-1 and LU-2.

(h) One (1) painting operation, identified as P-1, constructed in 2015, equipped with one (1) HVLP spray gun, coating metal parts in the open molding gel coat booth, with a maximum capacity of 0.07 gallons of coating per minute, using dry filters for particulate control, and exhausting to stack PB-1.

(i) One (1) trimming, grinding, and sanding booth, identified as T&G-01, constructed in 2015, with a maximum capacity of 300 pounds of reinforced plastic parts per hour, using a cartridge fabric filter system for particulate control, and exhausting to stack T&G-01.

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) Five (5) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

   (1) One (1) natural gas-fired boiler, identified as B-1, constructed in 2015, rated at 0.75 million British thermal units per hour, exhausting to stack B-1.

   (2) One (1) natural gas-fired furnace, identified as FCE-1, constructed in 2015, rated at 0.11 million British thermal units per hour, exhausting to stack F-1.

   (3) One (1) natural gas-fired water heater, identified as WH-1, constructed in 2015, rated at 0.04 million British thermal units per hour, exhausting to stack WH-1.

   (4) One (1) natural gas-fired make-up air heater, identified as MUH-1, constructed in 2015, rated at 3.0 million British thermal units per hour, exhausting to stack MUA-1.

   (5) One (1) natural gas-fired infrared heater, identified as IR-1, constructed in 2015, rated at 0.125 million British thermal units per hour, exhausting to stack IRH-1.

(b) One (1) submerged arc welding station, constructed in 2015, with a maximum capacity of 20 pounds of electrode per year, uncontrolled, and exhausting to the indoors.

(c) One (1) metal inert gas welding station, constructed in 2015, with a maximum capacity of 2,200 pounds of electrode per year, uncontrolled, and exhausting to the indoors.

(d) One (1) tungsten inert gas welding station, constructed in 2015, with a maximum capacity of 20 pounds of electrode per year, uncontrolled, and exhausting to the indoors.

(e) One (1) oxyacetylene flame cutting station, constructed in 2015, with a maximum metal cutting thickness of 0.185 inches and maximum metal cutting rate of 60 inches per minute, uncontrolled, and exhausting to the indoors.

(f) Paved and unpaved roads and parking lots with public access.

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, F111-41715-00029, 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) 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 F111-41715-00029 and issued pursuant to permitting programs approved into the state implementation plan have been either:

1. incorporated as originally stated,
2. revised, or
3. deleted.

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

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

1. That this permit contains a material mistake.
2. That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
3. That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

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

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]
B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
### B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

1. The changes are not modifications under any provision of Title I of the Clean Air Act;
2. Any approval required by 326 IAC 2-8-11.1 has been obtained;
3. The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
4. The Permittee notifies the:
   - Indiana Department of Environmental Management
     Permit Administration and Support Section, Office of Air Quality
     100 North Senate Avenue
     MC 61-53 IGCN 1003
     Indianapolis, Indiana 46204-2251
   - 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.
Entire Source

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

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

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

C.2 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.
**Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]  
If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.
C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

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

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

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

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) 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) One (1) resin transfer molding applicator, identified as RTM-1, constructed in 2015, with a maximum capacity of 7.5 pounds of resin per hour, uncontrolled, and exhausting indoors.

(b) One (1) open molding gel coat booth, identified as G-01, constructed in 2015, applying gel coats using air-atomized spray guns, with a maximum capacity of 2.5 gallons of gel coat per minute, using dry filters for particulate control, and exhausting to stack PB-1.

(c) One (1) tooling gel coat applicator, identified as TG-01, constructed in 2015, applying tooling gel coat to molds in the open molding gel coat booth using an air-atomized spray gun, with a maximum capacity of 500 pounds of tooling gel coat per year, using dry filters for particulate control, and exhausting to stack PB-1.

(d) One (1) fiberglass layup area, identified as FIT-01, constructed in 2015, applying resins and glass using fluid impingement technology (FIT), with a maximum capacity of 2.5 gallons of resin per minute, using dry filters for particulate control, and exhausting to stack LU-1 and LU-2.

(e) One (1) resin reinforcement process, identified as T-01, constructed 2015, applying resin using a brush in the fiberglass layup area, uncontrolled, and exhausting to stack LU-1 and LU-2.

(f) One (1) tooling resin applicator, identified as TR-1, constructed in 2015, applying tooling resin to molds in the fiberglass layup area using fluid impingement technology (FIT), with a maximum capacity of 500 pounds of tooling resin per year, using dry filters for particulate control, and exhausting to stack LU-1 and LU-2.

(g) One (1) glue gun, identified as GG-1, constructed in 2015, applying adhesive to reinforced plastic tanks, with a maximum capacity of 8 tanks per hour, uncontrolled, and exhausting to stacks LU-1 and LU-2.

(h) One (1) painting operation, identified as P-1, constructed in 2015, equipped with one (1) HVLP spray gun, coating metal parts in the open molding gel coat booth, with a maximum capacity of 0.07 gallons of coating per minute, using dry filters for particulate control, and exhausting to stack PB-1.

(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 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 8-1-6]

Pursuant 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 and 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

(a) The VOC emissions from the use of gel coats, catalysts, and solvents by the following shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 24.9 tons per twelve (12) consecutive months with compliance determined at the end of each month:

(1) Open molding gel coat booth (G-01), and
(2) Tooling gel coat applicator (TG-01).
Compliance with this limit shall limit the potential to emit VOC from G-01 and TG-01 to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

(b) The VOC emissions from the use of resins, catalysts, and solvents by the following shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 24.9 tons per twelve (12) consecutive months with compliance determined at the end of each month:

(1) Fiberglass layup area (FIT-01),
(2) Resin reinforcement process (T-01), and
(3) Tooling resin applicator (TR-1).

Compliance with this limit shall limit the potential to emit VOC from FIT-01, T-01, and TR-1 to less than twenty-five (25) tons per 12 consecutive month period, each and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

In addition, compliance with these limits and the limit in Condition D.1.2, combined with the potential to emit VOC from all other emission units at this source, shall also limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]
Pursuant 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a) The VOC emissions from the painting operation (P-1), shall not exceed 24.9 tons per twelve consecutive months with compliance determined at the end of each month.

Compliance with this limit and the limits in Condition D.1.1, combined with the potential to emit VOC from all other emission units at this source, shall also limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Volatile Organic Compounds (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]
Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at in the painting operation (P-1).

D.1.4 Volatile Organic Compounds (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]
Pursuant to 326 IAC 8-2-9(f), 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 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 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.1.5 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [326 IAC 2-4.1] [326 IAC 20-56] [326 IAC 20-80]
Pursuant 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

(a) The total input of gel coats, resins, catalysts, coatings, adhesives, and solvents by the following shall be limited such that the total potential to emit (PTE) of any single Hazardous Air Pollutant (HAP) shall not exceed 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

   (1) Resin transfer molding applicator (RTM-1),
   (2) Open molding gel coat booth (G-01),
   (3) Tooling gel coat applicator (TG-01),
   (4) Fiberglass layup area (FIT-01),
   (5) Resin reinforcement process (T-01),
   (6) Tooling resin applicator (TR-1),
   (7) Painting Operation (P-1), and
   (8) Glue gun (GG-1)

(b) The total input of gel coats, resins, catalysts, coatings, adhesives, and solvents by the following shall be limited such that the total potential to emit (PTE) of any combination of HAPs shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

   (1) Resin transfer molding applicator (RTM-1),
   (2) Open molding gel coat booth (G-01),
   (3) Tooling gel coat applicator (TG-01),
   (4) Fiberglass layup area (FIT-01),
   (5) Resin reinforcement process (T-01),
   (6) Tooling resin applicator (TR-1),
   (7) Painting Operation (P-1), and
   (8) Glue gun (GG-1)

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP), 326 IAC 20-56 (Reinforced Plastic Composites Production) and 326 IAC 20-80 (Surface Coating of Miscellaneous Metal Parts and Products) not applicable.

D.1.6 Particulate [326 IAC 6-3-2][326 IAC 2-2]
Pursuant to 326 IAC 6-3-2(d) and in order to render 326 IAC 2-2 not applicable, the particulate emissions from the following shall be controlled by dry particulate filters, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with the manufacturer's specifications:
(1) Open molding gel coat booth (G-01),
(2) Tooling gel coat applicator (TG-01),
(3) Fiberglass layup area (FIT-01),
(4) Tooling resin applicator (TR-1), and
(5) Painting Operation (P-1).

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any 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

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC and HAP input and emission limits contained in Conditions D.1.1, D.1.2, D.1.3, and D.1.5 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 and HAP data sheets or Material Safety Data Sheets (MSDS) for each gel coat, resin, catalyst, coating, adhesive, and solvent used in the reinforced plastics composites manufacturing operations. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC and HAP input and emission limits contained in Conditions D.1.1, D.1.2, and D.1.5 for gel coats, resins, catalysts, and solvents from the open molding operations shall be determined by multiplying the monthly usage of each resin and gel coat by the emission factor provided in "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, October 13, 2009, or its updates. VOC and HAPs emissions from the closed molding operations shall be calculated by multiplying the monthly usage of each resin and gel coat by the emission factor provided in "AP42, Chapter 4.4 - Polyester Resin Plastic Products Fabrication - Table 4.4.-2" for closed molding operations.

The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

D.1.9 Particulate Control

In order to comply with Condition D.1.6, the dry filters for particulate control shall be in operation and control emissions from the following at all times when one or more of the abovementioned emission units are in operation:

(1) Open molding gel coat booth (G-01),
(2) Tooling gel coat applicator (TG-01),
(3) Fiberglass layup area (FIT-01),
(4) Tooling resin applicator (TR-1), and
(5) Painting Operation (P-1).

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

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters controlling particulate emissions from the following:
(1) Open molding gel coat booth (G-01),
(2) Tooling gel coat applicator (TG-01),
(3) Fiberglass layup area (FIT-01),
(4) Tooling resin applicator (TR-1), and
(5) Painting Operation (P-1).

To monitor the performance of the dry filters, weekly observations shall be made of the overspray from stacks PB-1, LU-1, and LU-2 while one or more of the abovementioned emission units are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks 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 reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input and emission limits established in Conditions D.1.1, D.1.2, and D.1.5. Records necessary to demonstrate compliance shall be available no later than 30 days after the end of each compliance period.

(1) The amount, VOC and HAP content, and monomer content of each gel coat, resin, catalyst, coating, adhesive, and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS), waste manifests, and calculations necessary to verify the type and amount used.

(2) The total VOC and HAP usage for each month.

(3) The total amount of all of VOC emitted for each compliance period.

(4) The total amount of all single HAPs emitted for each compliance period; and

(5) The total amount of a combination of HAPs emitted for each compliance period.

(b) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.3. Records necessary to demonstrate compliance shall be available no later than 30 days after the end of each compliance period.

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

(2) The amount of coating material and solvent less water used on a monthly basis.
(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

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

(c) To document the compliance status with Condition D.1.10, the Permittee shall maintain a log of the daily and monthly inspections and weekly overspray observations. The Permittee shall include in its daily record when an inspection or observation is not taken and the reason for the lack of inspection or observation, (i.e. the process did not operate that day).

D.1.12 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2, and D.1.5 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(i) One (1) trimming, grinding, and sanding booth, identified as T&G-01, constructed in 2015, with a maximum capacity of 300 pounds of reinforced plastic parts per hour, using a cartridge fabric filter system for particulate control, and exhausting to stack T&G-01.

(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.2.1  PSD Minor Limits [326 IAC 2-2]

In order to render the 326 IAC 2-2 not applicable, the PM emissions after control from the trimming, grinding, and sanding booth (T&G-01) shall not exceed 1.15 pounds per hour.

Compliance with this limit, 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 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.2 Particulate Matter PM10 and PM2.5 [326 IAC 2-2] [326 IAC 2-8-4]

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

(a) The PM10 emissions after control from the trimming, grinding, and sanding booth (T&G-01) shall not exceed 1.15 pounds per hour.

(b) The PM2.5 emissions after control from the trimming, grinding, and sanding (T&G-01) shall not exceed 1.15 pounds per hour.

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) and 326 IAC 2-2 not applicable.

D.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trimming, grinding, and sanding booth shall not exceed 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour.

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

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

Where \( E \) = rate of emission in pounds per hour; and
\( P \) = process weight rate in tons per hour
D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for this facility and any 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

D.2.5 Particulate Control

(a) In order to comply with Conditions D.2.1, D.2.2, and D.2.3 the cartridge fabric filter system for particulate control shall be in operation and control emissions from the trimming, grinding, and sanding booth at all times that the trimming, grinding, and sanding booth is in operation.

(b) In the event that cartridge filter failure is observed in a multi-compartment cartridge fabric filter system, 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][326 IAC 2-8-5(a)(1)]

D.2.6 Parametric Monitoring

The Permittee shall record the pressure drop across the cartridge fabric filter system, which controls emissions from the trimming, grinding, and sanding booth at least once per day when the trimming, grinding, and sanding booth is in operation. When for any one reading, the pressure drop across the cartridge fabric filter system is outside the normal range the Permittee shall take a reasonable response. The normal range for the baghouse is a pressure drop between 1.5 and 4.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.7 Broken or Failed Cartridge Filter Detection

(a) For a single compartment cartridge fabric filter systems 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.

(b) For a single compartment cartridge fabric filter system 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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.
Cartridge filter failure can be indicated by a significant drop in the cartridge fabric filter system pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.6, the Permittee shall maintain daily records of the pressure drop across the cartridge fabric filter system controlling the particulate emissions from the trimming, grinding, and sanding booth. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

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

Emissions Unit Description:

(a) Five (5) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

   (1) One (1) natural gas-fired boiler, identified as B-1, constructed in 2015, rated at 0.75 million British thermal units per hour, exhausting to stack B-1.

   ... 

   (3) One (1) natural gas-fired water heater, identified as WH-1, constructed in 2015, rated at 0.04 million British thermal units per hour, exhausting to stack WH-1.

(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 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating), particulate emissions from the natural gas-fired boiler (B-1) and natural gas-fired water heater (WH-1) shall in no case exceed 0.6 pounds per MMBtu heat input, each.
# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
## OFFICE OF AIR QUALITY
### COMPLIANCE AND ENFORCEMENT BRANCH

## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

**Source Name:** Hoosier Metal Polish  
**Source Address:** 304 North Fairground Road, Kentland, Indiana 47951  
**FESOP Permit No.:** F111-41715-00029

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: |  |  |  |  |
This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
<table>
<thead>
<tr>
<th>If any of the following are not applicable, mark N/A</th>
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<tbody>
<tr>
<td>Date/Time Emergency started:</td>
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<td>Date/Time Emergency was corrected:</td>
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<td>Was the facility being properly operated at the time of the emergency?</td>
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<td>Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOX, CO, Pb, other:</td>
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<td>Estimated amount of pollutant(s) emitted during emergency:</td>
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<td>Describe the steps taken to mitigate the problem:</td>
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<td>Describe the corrective actions/response steps taken:</td>
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<td>Describe the measures taken to minimize emissions:</td>
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<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>
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Form Completed by: ________________________________________________
Title / Position: ____________________________________________________
Date: ____________________________________________________________
Phone: ____________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Hoosier Metal Polish
Source Address: 304 North Fairground Road, Kentland, Indiana 47951
FESOP Permit No.: F111-41715-00029
Facility: Open Molding Gel Coat Booth (G-01) and Tooling Gel Coat Applicator (TG-01)
Parameter: VOC Emissions

Limit: The VOC emissions from the use of gel coats, catalysts, and solvents by the open molding gel coat booth (G-01) and tooling gel coat applicator (TG-01) shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 24.9 tons per twelve (12) consecutive months with compliance determined at the end of each month.

<table>
<thead>
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<th>QUARTER: ___________________</th>
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<tr>
<td>Month</td>
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<td>Previous 11 Months</td>
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</table>

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.

Deviation has been reported on: ___________________

Submitted by: _____________________________________________________
Title / Position: __________________________________________________
Signature: _________________________________________________________
Date: _____________________________________________________________
Phone: ___________________________________________________________
FESOP Quarterly Report

Source Name: Hoosier Metal Polish
Source Address: 304 North Fairground Road, Kentland, Indiana 47951
FESOP Permit No.: F111-41715-00029
Facility: Fiberglass Layup Area (FIT-01), Resin Reinforcement Process (T-01), and Tooling Resin Applicator (TR-1)
Parameter: VOC Emissions
Limit: The VOC emissions from the use of resins, catalysts, and solvents by the fiberglass layup area (FIT-01), resin reinforcement process (T-01), and tooling resin applicator (TR-1) shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 24.9 tons per twelve (12) consecutive months with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:_____________________</th>
<th>YEAR:_____________________</th>
</tr>
</thead>
<tbody>
<tr>
<td>Month</td>
<td>Column 1</td>
</tr>
<tr>
<td></td>
<td>(VOC Emissions) (tons)</td>
</tr>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on: ________________

Submitted by: _______________________________________________________
Title / Position: _______________________________________________________
Signature: ___________________________________________________________
Date: _______________________________________________________________
Phone: _____________________________________________________________
# FESOP Quarterly Report

**Source Name:** Hoosier Metal Polish  
**Source Address:** 304 North Fairground Road, Kentland, Indiana 47951  
**FESOP Permit No.:** F111-41715-00029  
**Facility:** Painting Operation (P-1)  
**Parameter:** VOC Emissions  
**Limit:** The VOC emissions from the painting operation (P-1), shall not exceed 24.9 tons per twelve consecutive months with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(VOC Emissions) (tons)</td>
<td>(VOC Emissions) (tons)</td>
<td>(VOC Emissions) (tons)</td>
</tr>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

- [ ] No deviation occurred in this quarter.  
- [ ] Deviation/s occurred in this quarter.  
  Deviation has been reported on: ________________

Submitted by: ________________________________________________________________

Title / Position: ______________________________________________________________

Signature: _________________________________________________________________

Date: ________________

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

FESOP Quarterly Report

Source Name: Hoosier Metal Polish  
Source Address: 304 North Fairground Road, Kentland, Indiana 47951  
FESOP Permit No.: F111-41715-00029  

Facility: Resin Transfer Molding Applicator (RTM-1), Open Molding Gel Coat Booth (G-01), Tooling Gel Coat Applicator (TG-01), Fiberglass Layup Area (FIT-01), Resin Reinforcement Process (T-01), Tooling Resin Applicator (TR-1), Painting Operation (P-1), and Glue Gun

Parameter: Single HAP Input

Limit: The total input of gel coats, resins, catalysts, coatings, adhesives, and solvents by the resin transfer molding applicator (RTM-1), open molding gel coat booth (G-01), tooling gel coat applicator (TG-01), fiberglass layup area (FIT-01), resin reinforcement process (T-01), tooling resin applicator (TR-1), painting operation (P-1), and glue gun (GG-1) shall be limited such that the total potential to emit (PTE) of any single Hazardous Air Pollutant (HAP) shall not exceed 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER: ___________________</th>
<th>YEAR: ___________________</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Month</strong></td>
<td><strong>Column 1</strong></td>
</tr>
<tr>
<td></td>
<td>(Single HAP Input) (tons)</td>
</tr>
<tr>
<td>This Month</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.  
☐ Deviation(s) occurred in this quarter.  
Deviation has been reported on: ___________________

Submitted by: _____________________________________________________  
Title / Position: ____________________________________________________  
Signature: ________________________________________________________  
Date: ____________________________________________________________  
Phone: ___________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Hoosier Metal Polish  
Source Address: 304 North Fairground Road, Kentland, Indiana 47951  
FESOP Permit No.: F111-41715-00029

Facility: Resin Transfer Molding Applicator (RTM-1), Open Molding Gel Coat Booth (G-01), Tooling Gel Coat Applicator (TG-01), Fiberglass Layup Area (FIT-01), Resin Reinforcement Process (T-01), Tooling Resin Applicator (TR-1), Painting Operation (P-1), and Glue Gun

Parameter: Total HAP Input

Limit: The total input of gel coats, resins, catalysts, coatings, adhesives, and solvents by the resin transfer molding applicator (RTM-1), open molding gel coat booth (G-01), tooling gel coat applicator (TG-01), fiberglass layup area (FIT-01), resin reinforcement process (T-01), tooling resin applicator (TR-1), painting operation (P-1), and glue gun (GG-1) shall be limited such that the total potential to emit (PTE) of any combination of HAPs shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td>(Total HAP Input) (tons)</td>
<td>(Total HAP Input) (tons)</td>
<td>(Total HAP Input) (tons)</td>
</tr>
<tr>
<td>Previous 11 Months</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12 Month Total</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.

Deviation has been reported on: ___________________

Submitted by: _____________________________________________________
Title / Position: ____________________________________________________
Signature: ________________________________________________________
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".

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

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<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
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<tr>
<td>Date of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
</tr>
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<th>Permit Requirement (specify permit condition #)</th>
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</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</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>Hoosier Metal Polish</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>304 North Fairground Road, Kentland, Indiana 47951</td>
</tr>
<tr>
<td>County:</td>
<td>Newton</td>
</tr>
</tbody>
</table>
| SIC Code: | 3089 (Plastics Products, Not Elsewhere Classified)  
3524 (Lawn and Garden Tractors and Home Lawn and Garden Equipment) |
| Permit Renewal No.: | F111-41715-00029 |
| Permit Reviewer: | Alexandrea Neuzerling |

On July 25, 2019, Hoosier Metal Polish 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 Hoosier Metal Polish relating to the operation of a stationary reinforced plastic parts manufacturing plant, which primarily produces plastic tanks and fenders for lawn care tractors. Hoosier Metal Polish was issued its FESOP (F111-35414-00029) on April 24, 2015.

Existing Approvals

The source was issued FESOP No. F111-35414-00029 on April 24, 2015. There have been no subsequent approvals issued.

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) One (1) resin transfer molding applicator, identified as RTM-1, constructed in 2015, with a maximum capacity of 7.5 pounds of resin per hour, uncontrolled, and exhausting indoors.

(b) One (1) open molding gel coat booth, identified as G-01, constructed in 2015, applying gel coats using air-atomized spray guns, with a maximum capacity of 2.5 gallons of gel coat per minute, using dry filters for particulate control, and exhausting to stack PB-1.

(c) One (1) tooling gel coat applicator, identified as TG-01, constructed in 2015, applying tooling gel coat to molds in the open molding gel coat booth using an air-atomized spray gun, with a maximum capacity of 500 pounds of tooling gel coat per year, using dry filters for particulate control, and exhausting to stack PB-1.

(d) One (1) fiberglass layup area, identified as FIT-01, constructed in 2015, applying resins and glass using fluid impingement technology (FIT), with a maximum capacity of 2.5 gallons of resin per minute, using dry filters for particulate control, and exhausting to stack LU-1 and LU-2.

(e) One (1) resin reinforcement process, identified as T-01, constructed in 2015, applying resin using a brush in the fiberglass layup area, uncontrolled, and exhausting to stack LU-1 and LU-2.
(f) One (1) tooling resin applicator, identified as TR-1, constructed in 2015, applying tooling resin to molds in the fiberglass layup area using fluid impingement technology (FIT), with a maximum capacity of 500 pounds of tooling resin per year, using dry filters for particulate control, and exhausting to stack LU-1 and LU-2.

(g) One (1) glue gun, identified as GG-1, constructed in 2015, applying adhesive to reinforced plastic tanks, with a maximum capacity of 8 tanks per hour, uncontrolled, and exhausting to stacks LU-1 and LU-2.

(h) One (1) painting operation, identified as P-1, constructed in 2015, equipped with one (1) HVLP spray gun, coating metal parts in the open molding gel coat booth, with a maximum capacity of 0.07 gallons of coating per minute, using dry filters for particulate control, and exhausting to stack PB-1.

(i) One (1) trimming, grinding, and sanding booth, identified as T&G-01, constructed in 2015, with a maximum capacity of 300 pounds of reinforced plastic parts per hour, using a cartridge fabric filter system for particulate control, and exhausting to stack T&G-01.

No units have been added, modified, or removed as part of this Renewal.

<table>
<thead>
<tr>
<th>Insignificant Activities</th>
</tr>
</thead>
</table>

The source also consists of the following insignificant activities:

(a) Five (5) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) natural gas-fired boiler, identified as B-1, constructed in 2015, rated at 0.75 million British thermal units per hour, exhausting to stack B-1.

(2) One (1) natural gas-fired furnace, identified as FCE-1, constructed in 2015, rated at 0.11 million British thermal units per hour, exhausting to stack F-1.

(3) One (1) natural gas-fired water heater, identified as WH-1, constructed in 2015, rated at 0.04 million British thermal units per hour, exhausting to stack WH-1.

(4) One (1) natural gas-fired make-up air heater, identified as MUH-1, constructed in 2015, rated at 3.0 million British thermal units per hour, exhausting to stack MUA-1.

(5) One (1) natural gas-fired infrared heater, identified as IR-1, constructed in 2015, rated at 0.125 million British thermal units per hour, exhausting to stack IRH-1.

(b) One (1) submerged arc welding station, constructed in 2015, with a maximum capacity of 20 pounds of electrode per year, uncontrolled, and exhausting to the indoors.

(c) One (1) metal inert gas welding station, constructed in 2015, with a maximum capacity of 2,200 pounds of electrode per year, uncontrolled, and exhausting to the indoors.

(d) One (1) tungsten inert gas welding station, constructed in 2015, with a maximum capacity of 20 pounds of electrode per year, uncontrolled, and exhausting to the indoors.

(e) One (1) oxyacetylene flame cutting station, constructed in 2015, with a maximum metal cutting thickness of 0.185 inches and maximum metal cutting rate of 60 inches per minute, uncontrolled, and exhausting to the indoors.

(f) Paved and unpaved roads and parking lots with public access.
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 Newton County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO$_2$</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O$_3$</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.$^1$</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM$_{2.5}$ standard.</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>NO$_2$</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO$_2$ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

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

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO$_x$) 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 NO$_x$ emissions are considered when evaluating the rule applicability relating to ozone. Newton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO$_x$ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM$_{2.5}$
Newton County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NO$_x$ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).
Greenhouse Gas (GHG) Emissions

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

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
<th>PM</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
<th>SO_{2}</th>
<th>NO_{x}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>1,430</td>
<td>1,430</td>
<td>1,430</td>
<td>0.01</td>
<td>1.73</td>
<td>1,667</td>
<td>1.45</td>
<td>1,345</td>
<td>1,613</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>10</td>
<td>25</td>
<td></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>
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</tr>
</tbody>
</table>

1Under 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.”
2PM_{2.5} listed is direct PM_{2.5}.
3Single highest source-wide HAP = Styrene
*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 PM_{10}, PM_{2.5}, and VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source’s PM_{10}, PM_{2.5}, and VOC 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 equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source will be issued FESOP Renewal because the source will limit HAP emissions to less than the Title V major source threshold levels. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) 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>
</tr>
</thead>
<tbody>
<tr>
<td>PM¹</td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP.
*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 limits in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-8 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limits.

(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

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 Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for this source, because the natural gas-fired boiler has a heat input capacity of less than 10 MMBtu/hr.

(b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.
National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM and 326 IAC 20-80, are not included in the permit for the painting operation (P-1), since this source is a minor source of HAPs, as defined in 40 CFR 63.2. The source will limit the emissions of any single HAP to less than ten (10) tons per year and total HAPs to less than twenty-five (25) tons per year.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP and 326 IAC 20-81, are not included in the permit for the painting operation (P-1), since this source is a minor source of HAPs, as defined in 40 CFR 63.2. The source will limit the emissions of any single HAP to less than ten (10) tons per year and total HAPs to less than twenty-five (25) tons per year.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW and 326 IAC 20-56, are not included in the permit for the fiberglass reinforced plastic part manufacturing operations, since this source is a minor source of HAPs, as defined in 40 CFR 63.2. The source will limit the emissions of any single HAP to less than ten (10) tons per year and total HAPs to less than twenty-five (25) tons per year.

(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 the painting operation (P-1), since this source does not coat under any category listed in 40 CFR 63.11170(a).

(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 JJJJJJ, are not included in the permit for the natural gas-fired combustion units, since gas-fired boilers and gas-fired hot water heaters are exempt pursuant to 40 CFR 63.11195(e) and (f). The natural gas-fired furnace and other heaters do not meet the definition of an industrial, commercial, or institutional boiler located at an area source as defined in 40 CFR 63.11237.

(f) There are no 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

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

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Potential to Emit After Issuance section of this document.
PSD Minor Source Limits

This is an existing PSD minor source due to the following existing limits that have been carried over in the renewal. No change has been made.

PM, PM10 and PM2.5

(a) The PM emissions after control from the trimming, grinding, and sanding booth (T&G-01) shall not exceed 1.15 pounds per hour.

(b) The PM10 emissions after control from the trimming, grinding, and sanding booth (T&G-01) shall not exceed 1.15 pounds per hour.

(c) The PM2.5 emissions after control from the trimming, grinding, and sanding booth (T&G-01) shall not exceed 1.15 pounds per hour.

(d) The particulate emissions from the following shall be controlled by dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with the manufacturer’s specifications:

(1) Open molding gel coat booth (G-01),
(2) Tooling gel coat applicator (TG-01),
(3) Fiberglass layup area (FIT-01),
(4) Tooling resin applicator (TR-1), and
(5) Painting Operation (P-1).

The following determination made in the previous air permit still applies in this renewal:

The source has conservatively assumed the spray gun in the gel coat booth operates at its maximum rated capacity of 2.5 gallons of gel coat per minute for the entire year (8,760 hours). As a result, the potential to emit particulate matter of 1,242.76 tons per year is greatly overstated. Assuming the dry filters achieve a control efficiency of 95% the emissions after control are 62.14 tons per year. However, the particulate matter emissions from the gel coat booth are proportional to the amount of styrene emitted. In order to render 326 IAC 2-7 not applicable the source-wide styrene emissions shall not exceed 9.90 tons per year. Assuming all of the styrene is emitted from the gel coat booth equates to uncontrolled particulate matter emissions of 11.01 tons per year and controlled particulate matter emissions of 0.55 tons per year (see Appendix A for detailed calculations). Therefore, IDEM is only going to require the source to control the particulate matter emissions from the emission units identified above using dry filters in order to render 326 IAC 2-2 not applicable to the source and no numerical mass limits will be specified.

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 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.

VOC

(a) The VOC emissions from the use of gel coats, catalysts, and solvents by the following shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 24.9 tons per twelve (12) consecutive months with compliance determined at the end of each month:

(1) Open molding gel coat booth (G-01), and
(2) Tooling gel coat applicator (TG-01).
(b) The VOC emissions from the use of resins, catalysts, and solvents by the following shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 24.9 tons per twelve (12) consecutive months with compliance determined at the end of each month:

1. Fiberglass layup area (FIT-01).
2. Resin reinforcement process (T-01), and
3. Tooling resin applicator (TR-1).

(c) The VOC emissions from the painting operation (P-1), shall not exceed 24.9 tons per twelve consecutive months with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 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.

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 be limited to 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. See 326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants) rule evaluation below.

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) and 326 IAC 20 (Hazardous Air Pollutants)
FESOP applicability is discussed under the Potential to Emit After Issuance section of this document.

FESOP PM10, PM2.5, and VOC Limits
The following existing FESOP limits have been carried over to the renewal, and no change has been made.

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:

PM10 and PM2.5
(a) The PM10 emissions after control from the trimming, grinding, and sanding booth (T&G-01) shall not exceed 1.15 pounds per hour.
(b) The PM2.5 emissions after control from the trimming, grinding, and sanding (T&G-01) shall not exceed 1.15 pounds per hour.

VOC
(a) The VOC emissions from the use of gel coats, catalysts, and solvents by the open molding gel coat booth (G-01) and tooling gel coat applicator (TG-01) shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
(b) The VOC emissions from the use of resins, catalysts, and solvents by the fiberglass layup area (FIT-01), resin reinforcement process (T-01), and tooling resin applicator (TR-1) shall be limited such that the combined potential to emit (PTE) VOC shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The VOC emissions from the painting operation (P-1), shall not exceed 24.9 tons per twelve consecutive months with compliance determined at the end of each month.

These VOC limits are specified to render specific VOC rules not applicable. In doing so, the source-wide potential to emit VOC is also limited to less than 100 tons per year.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and VOC 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.

**FESOP HAP Limits**

The following existing limits have been carried over in the renewal, and no change has been made.

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

(a) The total input of gel coats, resins, catalysts, coatings, adhesives, and solvents by the following:

1. Resin transfer molding applicator (RTM-1),
2. Open molding gel coat booth (G-01),
3. Tooling gel coat applicator (TG-01),
4. Fiberglass layup area (FIT-01),
5. Resin reinforcement process (T-01),
6. Tooling resin applicator (TR-1),
7. Painting Operation (P-1), and
8. Glue gun (GG-1)

Shall be limited such that the total potential to emit (PTE) of any single Hazardous Air Pollutant (HAP) shall not exceed 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The total input of gel coats, resins, catalysts, coatings, adhesives, and solvents by the following:

1. Resin transfer molding applicator (RTM-1),
2. Open molding gel coat booth (G-01),
3. Tooling gel coat applicator (TG-01),
4. Fiberglass layup area (FIT-01),
5. Resin reinforcement process (T-01),
6. Tooling resin applicator (TR-1),
7. Painting Operation (P-1), and
8. Glue gun (GG-1)

Shall be limited such that the total potential to emit (PTE) of any combination of HAPs shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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

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 Newton 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 Newton 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 Newton 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:

Resin Transfer Molding Applicator (RTM-1)

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

Open Molding Gel Coat Booth (G-01) and Tooling Gel Coat Applicator (TG-01)

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 facility, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Particulate from G-01 and TG-01 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer’s specifications.
326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
This facility was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the facility is not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the facility to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the facility is not subject to the requirements of 326 IAC 8-1-6.

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

1. The VOC emissions from the use of gel coats, catalysts, and solvents by the open molding gel coat booth (G-01) and tooling gel coat applicator (TG-01) shall be limited such that the combined potential to emit (PTE) of VOC shall not exceed 24.9 tons per twelve (12) consecutive months with compliance determined at the end of each month. The open molding gel coat booth (G-01) and tooling gel coat applicator (TG-01) are considered one facility for the purposes of 326 IAC 8-1-6 because the gel coat and tooling gel coat are both applied to molds in the open molding gel coat booth.

Fiberglass Layup Area (FIT-01)/Resin Reinforcement Process (T-01)/Tooling Resin Applicator (TR-1)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
(a) Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Fiberglass Layup Area (FIT-01) and Tooling Resin Applicator (TR-1), since they are manufacturing processes 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).

Particulate from FIT-01 and TR-1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

(b) Pursuant to 326 IAC 6-3-1(b)(8), the Resin Reinforcement Process (T-01) is not subject to the requirements of 326 IAC 6-3, since T-01 applies resin using a brush.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
This facility was constructed after January 1, 1980, and its unlimited VOC potential emissions are equal to or greater than twenty-five (25) tons per year and the facility is not regulated by other rules in 326 IAC 8. The source has opted to limit the potential to emit VOC from the facility to less than twenty-five (25) tons per twelve (12) consecutive month period in order to render the requirements of 326 IAC 8-1-6 not applicable. Therefore, the facility is not subject to the requirements of 326 IAC 8-1-6.

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

1. The VOC emissions from the use of resins, catalysts, and solvents by the fiberglass layup area (FIT-01), resin reinforcement process (T-01), and tooling resin applicator (TR-1) shall be limited such that the combined potential to emit (PTE) of VOC shall not exceed 24.9 tons per twelve (12) consecutive months with compliance determined at the end of each month.

The fiberglass layup area (FIT-01), resin reinforcement process (T-01), and tooling resin applicator (TR-1) are considered one facility for the purposes of 326 IAC 8-1-6 because the resins are all applied to parts and molds in the fiberglass layup area.
**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**
Even though, this unit was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

**Painting Operation (P-1)***

**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 painting operation (P-1), since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Particulate from P-1 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**
The painting operation (P-1) is not subject to the requirements of 326 IAC 8-1-6 because is regulated by other rules in 326 IAC 8. The unit is subject to the requirements of 326 IAC 8-2-9.

**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 painting operation (P-1) is subject to the requirements of 326 IAC 8-2-9, since it was constructed in 2015, located in Newton County, and has the unlimited PTE of VOC equal to or greater than 25 tons/year, and this source performs miscellaneous metal surface coating under SIC Code major group #35.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the unit shall be not exceed 3.5 pounds of VOC per gallon of coating less water.

(b) This unit is also subject to the work practices specified under 326 IAC 8-2-9(f).

(c) Based on the MSDS submitted by the source and calculations made, the unit is able to comply with this requirement by using only as-applied compliant coatings.

**Trimming, Grinding, and Sanding Booth (T&G-01)***

**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 trimming, grinding, and sanding booth (T&G-01), since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the process shall not exceed 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour. The pound per hour limitation was calculated with the following equation:

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

where

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

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:

The cartridge fabric filter system shall be in operation at all times the trimming, grinding, and sanding booth is in operation, in order to comply with this limit.
Natural Gas Combustion (B-1, FCE-1, WH-1, MUH-1, and IR-1)

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

(a) Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 (boiler B-1 and water heater WH-1) are subject to the requirements of 326 IAC 6-2-4.

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

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

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

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

<table>
<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>Boiler (B-1) and Water Heater (WH-1)</td>
<td>2015</td>
<td>0.79</td>
<td>0.79</td>
<td>1.15</td>
<td>0.6</td>
<td>0.002</td>
</tr>
</tbody>
</table>

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

Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed.

Based on the natural gas fuel used by the boiler (B-1) and the water heater (WH-1), they meet the limit under 326 IAC 6-2-4(a), since the AP-42 emission factor, 0.002 lb/MMBtu, is less than the calculated allowable particulate matter under the rule.

(b) The furnace (FCE-1), make-up air heater (MUH-1), and infrared heater (IR-1) are not subject to the requirements of 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 1-2-59, the natural gas combustion units are not subject to the requirements of 326 IAC 6-3, since liquid and gaseous fuels and combustion air are not considered as part of the process weight.
326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the natural gas combustion 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 natural gas combustion units, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

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

Welding and Cutting

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
(a) Pursuant to 326 IAC 6-3-1(b)(9), each welding station is not subject to the requirements of 326 IAC 6-3, since each welding process consumes less than six hundred twenty-five (625) pounds of rod or wire per day.

(b) Pursuant to 326 IAC 6-3-1(b)(14), the oxyacetylene flame cutting station is not subject to the requirements of 326 IAC 6-3, since it has potential emissions of less than five hundred fifty-one thousandths (0.551) pounds per hour.

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.
The Compliance Determination Requirements applicable to this source are as follows:

1. Compliance with the VOC and HAP input and emission limits for the Resin Transfer Molding Applicator (RTM-1), Open Molding Gel Coat Booth (G-01), Tooling Gel Coat Applicator (TG-01), Fiberglass Layup Area (FIT-01), Resin Reinforcement Process, (T-01), Tooling Resin Applicator (TR-1), Painting Operation (P-1), and Glue Gun (GG-1) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets or Material Safety Data Sheets (MSDS) for each gel coat, resin, catalyst, coating, adhesive, and solvent used in the reinforced plastics composites manufacturing operations. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

2. Compliance with the VOC and HAP input and emission limits for gel coats, resins, catalysts, and solvents from the open molding operations (G-01 and TG-01) shall be determined by multiplying the monthly usage of each resin and gel coat by the emission factor provided in "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, October 13, 2009, or its updates. VOC and HAPs emissions from the closed molding operations shall be calculated by multiplying the monthly usage of each resin and gel coat by the emission factor provided in "AP42, Chapter 4.4 - Polyester Resin Plastic Products Fabrication - Table 4.4.-2" for closed molding operations.

The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

3. The dry filters for particulate control shall be in operation and control emissions from the gel coat booth (G-01), tooling gel coat applicator (TG-01), fiberglass layup area (FIT-01), tooling resin applicator (TR-1), and painting operation (P-1) at all times when one or more of the abovementioned emission units are in operation.

4. The cartridge fabric filter system for particulate control shall be in operation and control emissions from the trimming, grinding, and sanding booth at all times that the trimming, grinding, and sanding booth is in operation.

Testing Requirements:

1. IDEM has determined testing is not required for the gel coat booth since the operation of the dry filters and the proposed compliance monitoring requirements are sufficient for compliance demonstration (see PTE of the Entire Source After Issuance of the FESOP Section above for more details).

2. The unlimited and limited potential to emit for the trimming, grinding, and sanding booth was calculated using the baghouse specifications. The baghouse that controls this booth has a low airflow (3,000 acfm) and the outlet grain loading rate is 0.001 gr/dscf. Therefore, IDEM has determined testing is not required to demonstrate compliance with the FESOP and PSD minor limits for the trimming, grinding, and sanding booth since the baghouse specifications are sufficient for compliance demonstration.

3. There are no testing requirements applicable to this source.
(b) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Emission Unit / Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open Molding Gel Coat Booth (G-01) / Dry Filter and Tooling Gel Coat Applicator (TG-01) / Dry Filter(1)</td>
<td>Dry Filter Inspections</td>
<td>Daily</td>
<td>Verify the placement, integrity and particle loading of the filters</td>
</tr>
<tr>
<td></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>
<tr>
<td>Fiberglass Layup Area (FIT-01) / Dry Filter and Tooling Resin Applicator (TR-1) / Dry Filter(2)</td>
<td>Dry Filter Inspections</td>
<td>Daily</td>
<td>Verify the placement, integrity and particle loading of the filters</td>
</tr>
<tr>
<td></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>
<tr>
<td>Painting Operation (P-1) / Dry Filter(3)</td>
<td>Dry Filter Inspections</td>
<td>Daily</td>
<td>Verify the placement, integrity and particle loading of the filters</td>
</tr>
<tr>
<td></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>
<tr>
<td>Trimming, Grinding, and Sanding Booth (T&amp;G-01) / Cartridge Fabric Filter System(4)</td>
<td>Pressure drop monitoring</td>
<td>Daily</td>
<td>Within normal range of 1.5 to 4.0 inches of water, unless a different upper or lower value is established in the most recent compliant stack test</td>
</tr>
</tbody>
</table>

(1) These monitoring conditions are necessary because the Dry Filters for the Open Molding Gel Coat Booth (G-01) and Tooling Gel Coat Applicator (TG-01) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2 (PSD), and 326 IAC 2-8 (FESOP).

(2) These monitoring conditions are necessary because the Dry Filters for the Fiberglass Layup Area (FIT-01) and Tooling Resin Applicator (TR-1) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2 (PSD), and 326 IAC 2-8 (FESOP).
(3) These monitoring conditions are necessary because the Dry Filter for the Painting Operation (P-1) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(4) These monitoring conditions are necessary because the Cartridge Fabric Filter System for the Trimming, Grinding, and Sanding Booth (T&G-01) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2 (PSD), and 326 IAC 2-8 (FESOP).

**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) No major changes have been made as part of this FESOP Renewal.

**Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on July 25, 2019.

The operation of this stationary reinforced plastic parts manufacturing plant, which will primarily produce plastic tanks and fenders for lawn care tractors, shall be subject to the conditions of the attached proposed FESOP Renewal No. F111-41715-00029.

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 Alexandrea Neuzerling, 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) 232-6634 or (800) 451-6027, and ask for Alexandrea Neuzerling or (317) 232-6634.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](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](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).
## Summary of Emissions

**Company Name:** Hoosier Metal Polish  
**Source Location:** 304 N. Fairground Rd., Kentland, IN 47951  
**Permit No.:** F111-41715-00029  
**Reviewer:** Alexandrea Neuzerling

### Uncontrolled Potential to Emit (tpy)

<table>
<thead>
<tr>
<th>Process</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>
<th>Worst Case Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resin Transfer Molding (RTM-1)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.34</td>
<td>0</td>
<td>0.34</td>
<td>Styrene</td>
</tr>
<tr>
<td>Gelcoat Booth (G-01 and TG-01)</td>
<td>1,242.76</td>
<td>1,242.76</td>
<td>1,242.76</td>
<td>0</td>
<td>0</td>
<td>1,367</td>
<td>0</td>
<td>1,367</td>
<td>Styrene</td>
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<tr>
<td>Fiberglass Layup Area (FIT-01, T-01, and TR-1)</td>
<td>40.51</td>
<td>40.51</td>
<td>40.51</td>
<td>0</td>
<td>0</td>
<td>227.10</td>
<td>0</td>
<td>227.09</td>
<td>Styrene</td>
</tr>
<tr>
<td>Glue Gun (GG-1)</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0</td>
<td>0</td>
<td>7.38</td>
<td>0</td>
<td>4.96</td>
<td>MMA</td>
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<tr>
<td>Painting Operation (P-1)</td>
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<td>33.32</td>
<td>33.32</td>
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<td>0</td>
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<td>Xylen</td>
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<tr>
<td>Trimming, Grinding, and Sanding Booth (TG-01)</td>
<td>112.63</td>
<td>112.63</td>
<td>112.63</td>
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<td>0</td>
<td>0</td>
<td>0</td>
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</tr>
<tr>
<td>Welding and Cutting</td>
<td>0.48</td>
<td>0.48</td>
<td>0.48</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>negl.</td>
<td>negl.</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.73</td>
<td>0.10</td>
<td>1.45</td>
<td>0.033</td>
<td>Hexane</td>
</tr>
<tr>
<td>Total Potential to Emit</td>
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<td>1,430</td>
<td>1,430</td>
<td>0.01</td>
<td>1.73</td>
<td>1,667</td>
<td>1.45</td>
<td>1,613</td>
<td>1,345 Styrene</td>
</tr>
</tbody>
</table>

1 Total HAPs and any single HAP have been limited to render 326 IAC 2-7, 326 IAC 2-4.1, 326 IAC 20-56, and 326 IAC 20-80 not applicable to this source.  
2 VOC emissions have been limited to render 326 IAC 2-7 and 326 IAC 8-1-6 not applicable.  
3 PM, PM10, and PM2.5 emissions limited to render 326 IAC 2-2 and 326 IAC 2-7 not applicable.  
4 VOC emissions have been limited to render 326 IAC 2-7 not applicable.

### Limited Potential to Emit (tpy)

<table>
<thead>
<tr>
<th>Process</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>
<th>Worst Case Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resin Transfer Molding (RTM-1)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.34</td>
<td>0</td>
<td>0.34</td>
<td>Styrene</td>
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<tr>
<td>Gelcoat Booth (G-01 and TG-1)</td>
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<td>62.14</td>
<td>62.14</td>
<td>0</td>
<td>0</td>
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<td>0</td>
<td>24.00</td>
<td>Any Single HAP</td>
</tr>
<tr>
<td>Fiberglass Layup Area (FIT-01, T-01, and TR-1)</td>
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<td>2.03</td>
<td>2.03</td>
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<td>0</td>
<td>24.90</td>
<td>0</td>
<td>24.00</td>
<td>Any Single HAP</td>
</tr>
<tr>
<td>Glue Gun (GG-1)</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>7.38</td>
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<td>0</td>
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</tr>
<tr>
<td>Painting Operation (P-1)</td>
<td>1.67</td>
<td>1.67</td>
<td>1.67</td>
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<td>0</td>
<td>24.90</td>
<td>0</td>
<td>24.00</td>
<td>Any Single HAP</td>
</tr>
<tr>
<td>Trimming, Grinding, and Sanding Booth (TG-01)</td>
<td>5.04</td>
<td>5.04</td>
<td>5.04</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>0</td>
<td></td>
</tr>
<tr>
<td>Welding and Cutting</td>
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<td>0.48</td>
<td>0.48</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>negl.</td>
<td>negl.</td>
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<tr>
<td>Natural Gas Combustion</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.73</td>
<td>0.10</td>
<td>1.45</td>
<td>0.033</td>
<td>Hexane</td>
</tr>
<tr>
<td>Total Potential to Emit</td>
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<td>71.48</td>
<td>71.48</td>
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<td>82.52</td>
<td>1.45</td>
<td>24.03</td>
<td>8.00 Any Single HAP</td>
</tr>
</tbody>
</table>

### Fugitive Emissions

<table>
<thead>
<tr>
<th>Fugitive Emissions</th>
<th>Unpaved Roads</th>
<th>Paved Roads</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unpaved Roads</td>
<td>0.26</td>
<td>0.07</td>
</tr>
<tr>
<td>Paved Roads</td>
<td>0.24</td>
<td>0.05</td>
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<tr>
<td>Total PTE with Fugitives</td>
<td>71.88</td>
<td>71.60</td>
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</table>

1 Total HAPs and any single HAP have been limited to render 326 IAC 2-7, 326 IAC 2-4.1, 326 IAC 20-56, and 326 IAC 20-80 not applicable to this source.  
2 VOC emissions have been limited to render 326 IAC 2-7 and 326 IAC 8-1-6 not applicable.  
3 PM, PM10, and PM2.5 emissions limited to render 326 IAC 2-2 and 326 IAC 2-7 not applicable.  
4 VOC emissions have been limited to render 326 IAC 2-7 not applicable.
### Emissions Calculation

**HAPs Summary**

**Company Name:** Hoosier Metal Polish  
**Source Location:** 304 N. Fairground Rd., Kentland, IN 47951  
**Permit No.:** F111-41715-00029  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Process</th>
<th>Benzene</th>
<th>Cadmium</th>
<th>Carbon Tetrachloride</th>
<th>Chromium</th>
<th>Dichlorobenzene</th>
<th>Ethylbenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Lead</th>
<th>Manganese</th>
<th>MMA</th>
<th>Nickel</th>
<th>Styrene</th>
<th>Toluene</th>
<th>Xylene</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resin Transfer Molding (RTM-1)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.34</td>
<td>-</td>
<td>-</td>
<td>0.34</td>
</tr>
<tr>
<td>Gelcoat Booth (G-01 and TG-01)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<td>-</td>
<td>249.41</td>
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<td>1367.12</td>
</tr>
<tr>
<td>Fiberglass Layup Area (FIT-01, T-01, and TR-1)</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>227.09</td>
<td>-</td>
<td>4.91</td>
<td>1367.12</td>
</tr>
<tr>
<td>Glue Gun (GGS-1)</td>
<td>-</td>
<td>-</td>
<td>0.04</td>
<td>-</td>
<td>-</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>4.91</td>
<td>4.95</td>
<td>-</td>
<td>-</td>
<td>4.95</td>
</tr>
<tr>
<td>Painting Operation (P-1)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2.97</td>
<td>-</td>
<td>-</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>4.91</td>
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<td>-</td>
<td>4.95</td>
</tr>
<tr>
<td>Trimming, Grinding, and Sanding Booth (TG-01)</td>
<td>-</td>
<td>-</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>9.89</td>
<td>-</td>
<td>-</td>
<td>12.85</td>
</tr>
<tr>
<td>Welding and Cutting</td>
<td>-</td>
<td>-</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<td>-</td>
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<td>-</td>
<td>-</td>
<td>0.00</td>
<td>-</td>
<td>-</td>
<td>0.00</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.03</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.03</td>
</tr>
<tr>
<td><strong>Total HAPs</strong></td>
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<td>0.00</td>
<td>0.04</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>2.97</td>
<td>0.03</td>
<td>0.00</td>
<td>0.00</td>
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<td>254.38</td>
<td>1345.07</td>
<td>9.89</td>
<td>1612.38</td>
<td></td>
</tr>
</tbody>
</table>
Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Resin Transfer Molding Operation

Company Name: Hoosier Metal Polish
Source Location: 304 N. Fairground Rd., Kentland, IN 47951
Permit No.: F111-41715-00029
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Material</th>
<th>Density of Resin (lb/gal)</th>
<th>Maximum Amount of Resin (gal/hr)</th>
<th>Weight % Monomer</th>
<th>Emission Factor (weight % of starting monomer emitted)</th>
<th>Tons of VOC per Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chemlease PMR EZ</td>
<td>6.0</td>
<td>1.25</td>
<td>34.00%</td>
<td>3.00%</td>
<td>0.34</td>
</tr>
</tbody>
</table>

Worst case Emission Factors for Closed Molding are 3% Based on AP-42 4.4-2.

**METHODODOLOGY:**
Source estimates the mixers maximum capacity is 7.5 pounds of resin per hour.

\[
\text{Tons of VOC per Year} = \text{Density of Resin (lb/gal)} \times \text{Maximum Amount of Resin (gal/hr)} \times \text{Weight % Monomer} \times \text{Emission Factor} \times 8,760 \text{ (hr/yr)} \times \frac{1}{2,000} \text{ (ton/lb)}
\]
### Appendix A: Emissions Calculations

#### Reinforced Plastics and Composites

#### Gelcoat Operations

**Company Name:** Hoosier Metal Polish  
**Source Location:** 304 N. Fairground Rd., Kentland, IN 47951  
**Permit No.:** F111-41715-00029  
**Reviewer:** Alexandrea Neuzerling

#### Gelcoat Application (G-01) - Mechanical Atomized

<table>
<thead>
<tr>
<th>Gelcoat Application</th>
<th>Density (lb/gal)</th>
<th>Wt. % Monomer</th>
<th>Styrene UEF (lbs/ton)</th>
<th>MMA UEF (lbs/ton)</th>
<th>Gallons per Minute</th>
<th>Styrene Emissions (tons/yr)</th>
<th>MMA Emissions (tons/yr)</th>
<th>VOC Emissions (tons/year)</th>
<th>Transfer Efficiency</th>
<th>Controlled PM Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black Gel Coat</td>
<td>10.13</td>
<td>34.04%</td>
<td>4.61%</td>
<td>315.00</td>
<td>75.00</td>
<td>2.5</td>
<td>1,047.74</td>
<td>249.46</td>
<td>75%</td>
<td>1,297.20</td>
</tr>
<tr>
<td>Gray Gel Coat</td>
<td>11.68</td>
<td>35.20%</td>
<td>0.00%</td>
<td>336.00</td>
<td>0.00</td>
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<td>1,117.59</td>
<td>0.00</td>
<td>75%</td>
<td>1,117.59</td>
</tr>
<tr>
<td>White Gel Coat</td>
<td>10.90</td>
<td>30.40%</td>
<td>4.97%</td>
<td>270.59</td>
<td>75.00</td>
<td>2.5</td>
<td>900.01</td>
<td>249.46</td>
<td>75%</td>
<td>1,149.48</td>
</tr>
<tr>
<td>Clear Gel Coat</td>
<td>8.64</td>
<td>35.00%</td>
<td>0.00%</td>
<td>336.00</td>
<td>0.00</td>
<td>2.5</td>
<td>1,117.59</td>
<td>0.00</td>
<td>75%</td>
<td>1,166.72</td>
</tr>
</tbody>
</table>

**Total:** 1,117.59 249.46 1,367.34 1,242.76 62.14

#### Tooling Gelcoat Application (TG-1) - Mechanical Atomized

<table>
<thead>
<tr>
<th>Tooling Gelcoat Application</th>
<th>Density (lb/gal)</th>
<th>Wt. % Monomer</th>
<th>Styrene UEF (lbs/ton)</th>
<th>MMA UEF (lbs/ton)</th>
<th>Gallons per Year¹</th>
<th>Styrene Emissions (tons/yr)</th>
<th>MMA Emissions (tons/yr)</th>
<th>VOC Emissions (tons/year)</th>
<th>Transfer Efficiency</th>
<th>Controlled PM Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tooling Gelcoat</td>
<td>9.10</td>
<td>41.84%</td>
<td>3.88%</td>
<td>481.00</td>
<td>60.00</td>
<td>54.9</td>
<td>0.06</td>
<td>0.01</td>
<td>75%</td>
<td>0.03</td>
</tr>
</tbody>
</table>

**Total:** 1,117.65 249.47 1,367.41 1,242.76 62.14

---

**METHODOLOGY**

Monomer Emission Factors based on UEF Emission Factors for Open Molding (UEF-1-2011a) (Revised and Approved 10/13/2009) for Atomized Mechanical Gelcoat Application.

\[
\text{Pollutant Emissions (tons/yr)} = \text{Pollutant EF (lbs/ton)} \times \text{gallons per minute} \times 60 \text{ (min/hr)} \times \text{density (lbs/gal)} \times \frac{1}{2000} \text{ (ton/lb)} \times \frac{1}{2000} \text{ (ton/lb)} \times 8760 \text{ (hrs/yr)}
\]

\[
\text{VOC Emissions}} (\text{tons/yr}) = \text{Styrene Emissions (tons/yr)} + \text{MMA Emissions (tons/yr)}
\]

\[
\text{PM Emissions}} (\text{tons/yr}) = \text{Density (lbs/gal)} \times \text{gallons per year} \times (1 - \text{wt. % Styrene + wt. % MMA}) \times (1-\text{transfer efficiency}) \times 8760 \text{ (hrs/yr)} \times \frac{1}{2000} \text{ (ton/lb)}
\]

\[
\text{Controlled PM Emissions (tons/yr)} = \text{PM Emissions (tons/yr)} \times (1-\text{CE%})
\]

---

**Demonstration of Potential PM Emissions based on HAPs limits**

<table>
<thead>
<tr>
<th>Process</th>
<th>PM Emitted to Stryene Emited Ratio</th>
<th>Limited Stryene Emissions (tons/yr)*</th>
<th>PM Emissions (tons/yr)</th>
<th>Controlled PM Emissions ( tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gelcoat Application (G-01) and Tooling Gelcoat Application (TG-1)</td>
<td>1.11 9.90 11.01 0.55</td>
<td>11.01 0.55</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*The source-wide emissions of styrene shall not exceed 9.90 tons per year, so this operating scenario assumes all of the styrene is emitted by the gelcoat application and tooling gelcoat application to determine the worst case PM emissions.

**METHODOLOGY**

PM Emitted to Stryene Emitted Ratio = Total PM Emissions from G-1 and TG-1 (tons/yr) / Total Styrene Emissions from G-1 and TG-1 (tons/yr)

PM Emissions (tons/yr) = PM Emitted to Stryene Emitted Ratio * Limited Stryene Emissions (tons/yr)

Controlled PM Emissions (tons/yr) = PM Emissions (tons/yr) * (1-CE%)
Appendix A: Emissions Calculations
Reinforced Plastics and Composites
Resin Operations

Company Name: Hoosier Metal Polish
Source Location: 304 N. Fairground Rd., Kentland, IN 47951
Permit No.: F111-41715-00029
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Resin Application (FIT-01)</th>
<th>Density (lb/gal)</th>
<th>Wt. % Monomer Styrene</th>
<th>Wt. % Monomer MMA</th>
<th>Styrene UEF (lbs/ton)</th>
<th>MMA UEF (lbs/ton)</th>
<th>Gallons per Minute</th>
<th>Styrene Emissions (tons/yr)</th>
<th>MMA Emissions (tons/yr)</th>
<th>VOC Emissions (tons/year)</th>
<th>Transfer Efficiency</th>
<th>PM Emissions (tons/yr)</th>
<th>Control Efficiency</th>
<th>Controlled PM Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polyester Resin</td>
<td>9.34</td>
<td>34.00%</td>
<td>0.00%</td>
<td>74.00</td>
<td>0.00</td>
<td>2.5</td>
<td>227.07</td>
<td>0.00</td>
<td>227.07</td>
<td>99%</td>
<td>40.50</td>
<td>95%</td>
<td>2.03</td>
</tr>
</tbody>
</table>

METHODOLOGY
Monomer Emission Factors based on UEF Emission Factors for Open Molding (UEF-1-2011a) (Revised and Approved 10/13/2009).

1 Mechanical non-atomized application

Pollutant Emissions (tons/yr) = Pollutant EF (lbs/ton) * gallons per minute * 60 (min/hr) * density (lbs/gal) * 1/2,000 (ton/lb) * 1/2,000 (ton/lb) * 8760 (hrs/yr)

VOC Emissions (tons/yr) = Styrene Emissions (tons/yr) + MMA Emissions (tons/yr)

PM Emissions (tons/yr) = Density (lbs/gal) * gal/min * 60 min/hr * (1 - (wt. % Styrene + wt. % MMA)) * (1-transfer efficiency) * 8760 (hrs/yr) * 1/2,000 (ton/lb)

Controlled PM Emissions (tons/yr) = PM Emissions (tons/yr) * (1-CE%)

<table>
<thead>
<tr>
<th>Resin Application (TR-1 and T-01)</th>
<th>Density (lb/gal)</th>
<th>Wt. % Monomer Styrene</th>
<th>Wt. % Monomer MMA</th>
<th>Wt. % VOC (Non Styrene/MMA)</th>
<th>Styrene UEF (lbs/ton)</th>
<th>MMA UEF (lbs/ton)</th>
<th>Gallons per Year¹</th>
<th>Styrene Emissions (tons/yr)</th>
<th>MMA Emissions (tons/yr)</th>
<th>VOC Emissions (tons/year)</th>
<th>Transfer Efficiency</th>
<th>PM Emissions (tons/yr)</th>
<th>Control Efficiency</th>
<th>Controlled PM Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tool Resin</td>
<td>9.17</td>
<td>38.00%</td>
<td>0.00%</td>
<td>-0.00%</td>
<td>5.00%</td>
<td>75.60</td>
<td>86.00</td>
<td>54.5</td>
<td>0.01</td>
<td>0.00</td>
<td>99%</td>
<td>0.001</td>
<td>95%</td>
<td>7.13E-05</td>
</tr>
<tr>
<td>Radius Compound</td>
<td>11.30</td>
<td>30.00%</td>
<td>1.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>70.80</td>
<td>0.00</td>
<td>0.01</td>
<td>0.004</td>
<td>0.013</td>
<td>100%</td>
<td>0.00</td>
<td>0%</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Total: 0.02 0.004 0.04 0.001 7.13E-05

METHODOLOGY
Monomer Emission Factors based on UEF Emission Factors for Open Molding (UEF-1-2011a) (Revised and Approved 10/13/2009).

1 Source estimates they will use 500 pounds of tooling resin per year and 800 pounds of Radius Compound per year.

³ Mechanical non-atomized application

³ Manual (brush) application

Pollutant Emissions (tons/yr) = Pollutant EF (lbs/ton) * gallons/yr * density (lbs/gal) * 1/2,000 (ton/lb)

VOC Emissions from Tool Resin (tons/yr) = Density (lb/gal) * Wt. % VOC * gallons/yr / 2,000 (ton/lb) + Styrene Emissions (tons/yr) + MMA Emissions (tons/yr)

VOC Emissions Radius Compound (tons/yr) = Styrene Emissions (tons/yr) + MMA Emissions (tons/yr)

PM Emissions (tons/yr) = Density (lbs/gal) * gal/yr * (1 - (wt. % Styrene + wt. % MMA)) * (1-transfer efficiency) * 1 ton / 2000 lbs

Controlled PM Emissions (tons/yr) = PM Emissions (tons/yr) * (1-CE%)
Appendix A: Emissions Calculations
Glue Gun

Company Name: Hoosier Metal Polish  
Source Location: 304 N. Fairground Rd., Kentland, IN 47951  
Permit No.: F111-41715-00029  
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>VOC Content (%)</th>
<th>MMA Content (%)</th>
<th>Carbon Tetrachloride Content (%)</th>
<th>Maximum (parts/hour)</th>
<th>Usage (gal/part)</th>
<th>VOC/HAP Emitted (%)</th>
<th>Potential VOC (ton/yr)</th>
<th>Potential MMA (ton/yr)</th>
<th>Potential Carbon Tetrachloride (ton/yr)</th>
<th>Total HAPs (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plexus MA310</td>
<td>8.38</td>
<td>100.00%</td>
<td>66.50%</td>
<td>0.50%</td>
<td>8.00</td>
<td>2.51</td>
<td>1.00%</td>
<td>7.38</td>
<td>4.91</td>
<td>0.04</td>
<td>4.95</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

Per the environmental data sheet a maximum of 1% of the VOC is emitted.

Potential VOC/HAP (ton/yr) = Density (lb/gal) * VOC/HAP Content (%) * Maximum (parts/hr) * Usage (gal/part) * VOC/HAP Emitted (%) * 8,760 (hrs/yr) * 1/2,000 (ton/lb)
## Appendix A: Emissions Calculations

### Painting Operation (P-1)

**Company Name:** Hoosier Metal Polish  
**Source Location:** 304 N. Fairground Rd., Kentland, IN 47951  
**Permit No.:** F111-41715-00029  
**Reviewer:** Alexandrea Neuzerling

### Material Density

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Maximum (gal/min)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>PTE VOC lb/hr</th>
<th>PTE VOC lbs/day</th>
<th>PTE VOC tons/year</th>
<th>PTE PM (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>*Transfer Efficiency</th>
<th>Control Efficiency</th>
<th>Controlled PTE PM (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Painting Operation</strong></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Red Paint</td>
<td>9.47</td>
<td>9.60%</td>
<td>0.00%</td>
<td>28.60%</td>
<td>0.00%</td>
<td>58.50%</td>
<td>0.07</td>
<td>2.71</td>
<td>2.71</td>
<td>11.38</td>
<td>273.01</td>
<td>49.82</td>
<td>31.10</td>
<td>4.63</td>
<td>75%</td>
<td>95%</td>
<td>1.67</td>
</tr>
<tr>
<td>Black Paint</td>
<td>10.75</td>
<td>32.00%</td>
<td>0.00%</td>
<td>32.00%</td>
<td>0.00%</td>
<td>55.00%</td>
<td>0.07</td>
<td>3.50</td>
<td>3.50</td>
<td>14.72</td>
<td>353.25</td>
<td>64.47</td>
<td>33.32</td>
<td>6.37</td>
<td>75%</td>
<td>95%</td>
<td>1.87</td>
</tr>
<tr>
<td><strong>Worst Case Coating:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

### METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

### Potential VOC Pounds per Hour

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Maximum (gal/min) * 60 (min/hr)

### Potential VOC Pounds per Day

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Maximum (gal/min) * 60 (min/hr) * (24 hr/day)

### Potential VOC Tons per Year

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Maximum (gal/min) * 60 (min/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)

### Particulate Potential Tons per Year

Particulate Potential Tons per Year = (gal/min) * 60 (min/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

### Controlled PM Emissions (tons/yr) = PM Emissions (tons/yr) * (1-CE%)

### Material Emissions

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/min)</th>
<th>Weight % Ethylbenzene</th>
<th>Weight % Xylene</th>
<th>Ethylbenzene Emissions (ton/yr)</th>
<th>Xylene Emissions (ton/yr)</th>
<th>Total HAPs (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>P-1</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Red Paint</td>
<td>9.47</td>
<td>0.07</td>
<td>0.10%</td>
<td>0.0%</td>
<td>0.17</td>
<td>0.00</td>
<td>0.17</td>
</tr>
<tr>
<td>Black Paint</td>
<td>10.75</td>
<td>0.07</td>
<td>1.50%</td>
<td>5.00%</td>
<td>2.97</td>
<td>9.89</td>
<td>12.85</td>
</tr>
<tr>
<td><strong>Worst Case Coating:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

### METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/min) * Weight % HAP * 60 min/hr * 8760 hrs/yr * 1 ton/2000 lbs
Appendix A: Emissions Calculations
Particulate Emissions
Trimming, Grinding, and Sanding Booth

Company Name: Hoosier Metal Polish
Source Location: 304 N. Fairground Rd., Kentland, IN 47951
Permit No.: F111-41715-00029
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Outlet Loading (gr/acf)</th>
<th>Flow Rate (acfm)</th>
<th>Control Efficiency (%)</th>
<th>PTE PM before controls (lbs/hr)</th>
<th>PTE PM before controls (tons/yr)</th>
<th>PTE PM after controls (lbs/hr)</th>
<th>PTE PM after controls (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.001</td>
<td>3,000</td>
<td>99.90%</td>
<td>25.71</td>
<td>112.63</td>
<td>0.03</td>
<td>0.11</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td></td>
<td></td>
<td><strong>25.71</strong></td>
<td><strong>112.63</strong></td>
<td><strong>0.03</strong></td>
<td><strong>0.11</strong></td>
</tr>
</tbody>
</table>

METHODOLOGY
Outlet loading, flow rate, and control efficiency provided by source.
PTE PM before controls (lb/hr) = PTE PM after controls (lb/hr) / (1-control efficiency)
PTE PM before controls (tons/yr) = PTE PM before controls (lbs/hr) * 8760 hr/yr * 1 ton /2000 lbs
PTE PM after controls (lb/hr) = Outlet Loading (gr/acf) * Flow rate (acfm) * 60 min / hr / 7,000 (gr/lb)
PTE PM after controls (tons/yr) = PTE PM after controls (lbs/hr) * 8760 hr/yr * 1 ton /2000 lbs

<table>
<thead>
<tr>
<th>326 IAC 6-3-2(e) Allowable Rate of Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process Rate (lbs/hr)</td>
</tr>
<tr>
<td>------------------------</td>
</tr>
<tr>
<td>Trimming, Grinding, and Sanding Booth</td>
</tr>
</tbody>
</table>

Allowable PM Emissions (lbs/hr) = 4.10 * PWR (tons/hr)^0.67
## Appendix A: Emissions Calculations

### Welding and Thermal Cutting

**Company Name:** Hoosier Metal Polish  
**Source Location:** 304 N. Fairground Rd., Kentland, IN 47951  
**Permit No.:** F111-41715-00029  
**Reviewer:** Alexandrea Neuzerling

#### PROCESS Number of Max. electrode HAPS  
<table>
<thead>
<tr>
<th></th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/yr)</th>
<th>EMISSION FACTORS*</th>
<th>EMISSIONS (lbs/yr)</th>
<th>HAPS (lbs/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>WELDING</strong></td>
<td></td>
<td></td>
<td>PM = PM10 Mn Ni Cr</td>
<td>PM = PM10 Mn Ni Cr</td>
<td></td>
</tr>
<tr>
<td>Submerged Arc</td>
<td>1</td>
<td>20</td>
<td>0.036 0.011</td>
<td>0.720 0.220 0.000 0 0</td>
<td>0.220</td>
</tr>
<tr>
<td>Metal Inert Gas (MIG)(carbon steel)</td>
<td>1</td>
<td>2200</td>
<td>0.0055 0.0005</td>
<td>12.100 1.100 0.000 0</td>
<td>1.100</td>
</tr>
<tr>
<td>Tungsten Inert Gas (TIG)(carbon steel)</td>
<td>1</td>
<td>20</td>
<td>0.0055 0.0005</td>
<td>0.110 0.010 0.000 0</td>
<td>0.010</td>
</tr>
</tbody>
</table>

#### FLAME CUTTING  
<table>
<thead>
<tr>
<th></th>
<th>Number of Stations</th>
<th>Max. Metal Thickness Cutting Rate (in./minute)</th>
<th>EMISSION FACTORS</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oxyacetylene</td>
<td>1</td>
<td>0.185 60</td>
<td>0.1622 0.0005 0.0001 0.0003</td>
<td>0.108 0.000 0.000 0.000 0</td>
<td>0.001</td>
</tr>
</tbody>
</table>

### EMISSION TOTALS

<table>
<thead>
<tr>
<th></th>
<th>Potential Emissions lbs/yr</th>
<th>Potential Emissions lbs/day</th>
<th>Potential Emissions tons/year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>959.23</td>
<td>4.25</td>
<td>0.48</td>
</tr>
</tbody>
</table>

**Methodology:**  
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.*  
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 inches cut, 1" thick)  
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)  
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
Emissions, tons/year = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
# Appendix A: Emissions Calculations
## Natural Gas Combustion Only
### MM BTU/HR <100

**Company Name:** Hoosier Metal Polish  
**Source Location:** 304 N. Fairground Rd., Kentland, IN 47951  
**Permit No.:** F111-41715-00029  
**Reviewer:** Alexandrea Neuzerling

### Heat Input Capacity Table

<table>
<thead>
<tr>
<th>Unit</th>
<th>MMBtu/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boiler</td>
<td>0.75</td>
</tr>
<tr>
<td>Furnace</td>
<td>0.11</td>
</tr>
<tr>
<td>Water Heater</td>
<td>0.04</td>
</tr>
<tr>
<td>Make-up Air Heater</td>
<td>3.0</td>
</tr>
<tr>
<td>IR Heater</td>
<td>0.125</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>4.03</td>
</tr>
</tbody>
</table>

### Potential Throughput Table

<table>
<thead>
<tr>
<th>HHV Potential Throughput</th>
<th>mmBtu</th>
<th>MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boiler</td>
<td>0.75</td>
<td>0.11</td>
</tr>
<tr>
<td>Furnace</td>
<td>0.11</td>
<td>0.04</td>
</tr>
<tr>
<td>Water Heater</td>
<td>0.04</td>
<td>3.0</td>
</tr>
<tr>
<td>Make-up Air Heater</td>
<td>3.0</td>
<td>0.125</td>
</tr>
<tr>
<td>IR Heater</td>
<td>0.125</td>
<td>4.03</td>
</tr>
</tbody>
</table>

### Pollutant Emission Table

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.03</td>
<td>0.13</td>
<td>0.13</td>
<td>0.01</td>
<td>1.73</td>
<td>0.10</td>
<td>1.45</td>
</tr>
</tbody>
</table>

**PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM10 and PM2.5 combined, respectively.**

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

### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>3.630E-05</td>
<td>2.074E-05</td>
<td>1.296E-03</td>
<td>3.111E-02</td>
<td>5.877E-05</td>
</tr>
</tbody>
</table>

### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>8.642E-06</td>
<td>1.901E-05</td>
<td>2.420E-05</td>
<td>6.568E-06</td>
<td>3.630E-05</td>
</tr>
</tbody>
</table>

**Methodology**

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

**Company Name:** Hoosier Metal Polish  
**Source Location:** 304 N. Fairground Rd., Kentland, IN 47951  
**Permit No.:** F111-41715-00029  
**Reviewer:** Alexandrea Neuzerling

**Unpaved Roads at Industrial Site**

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

### Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (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 (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Freight Vehicle (leaving plant) (one-way trip)</td>
<td>4.0</td>
<td>1.0</td>
<td>4.0</td>
<td>40.0</td>
<td>160.0</td>
<td>300</td>
<td>0.057</td>
<td>0.2</td>
<td>83.0</td>
</tr>
</tbody>
</table>

**Average Vehicle Weight Per Trip =** 40.0 tons/trip  
**Average Miles Per Trip =** 0.06 miles/trip

### Unmitigated Emission Factor, $E_f$

Unmitigated Emission Factor, $E_f = k^*[\left(\frac{s}{12}\right)^a]*[\left(\frac{W}{3}\right)^b]$  
(Equation 1a from AP-42 13.2.2)

- $k = 4.9, 1.5, 0.15$ lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)  
- $s = 6.0, 6.0, 6.0$ % = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)  
- $a = 0.7, 0.9, 0.9$ = constant (AP-42 Table 13.2.2-2 for Industrial Roads)  
- $W = 40.0, 40.0, 40.0$ tons = average vehicle weight  
- $b = 0.45, 0.45, 0.45$ = constant (AP-42 Table 13.2.2-2 for Industrial Roads)

### Mitigated Emission Factor, $E_{ext}$

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$  
(Equation 2 from AP-42 13.2.2)

- $E_{ext} = E * [(365 - P)/365]$ where $P = 125$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

### Process

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Freight Vehicle (leaving plant) (one-way trip)</td>
<td>0.26</td>
<td>0.07</td>
<td>0.01</td>
</tr>
</tbody>
</table>

**Totals**  
4.0 | 160.0 | 0.2 | 83.0 | 9.68 | 2.58 | 0.26 | 6.36 | 1.70 | 0.17 | 0.26 | 0.07 | 0.01

### Methodology

<table>
<thead>
<tr>
<th>Calculation</th>
<th>Formula</th>
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</thead>
<tbody>
<tr>
<td>Total Weight driven per day (ton/day)</td>
<td>$= [\text{Maximum Weight of Loaded Vehicle (tons/trip)}] * [\text{Maximum trips per day (trip/day)}]$</td>
</tr>
<tr>
<td>Maximum one-way distance (mi/trip)</td>
<td>$= [\text{Maximum one-way distance (feet/trip)}] / [5280 \text{ ft/mile}]$</td>
</tr>
<tr>
<td>Maximum one-way miles (miles/day)</td>
<td>$= [\text{Maximum trips per year (trip/day)}] * [\text{Maximum one-way distance (mi/trip)}]$</td>
</tr>
<tr>
<td>Average Vehicle Weight Per Trip (tons/trip)</td>
<td>$= \text{SUM}[\text{Total Weight driven per day (ton/day)}] / \text{SUM}[\text{Maximum trips per day (trip/day)}]$</td>
</tr>
<tr>
<td>Average Miles Per Trip (miles/trip)</td>
<td>$= \text{SUM}[\text{Maximum one-way miles (miles/day)}] / \text{SUM}[\text{Maximum trips per year (trip/day)}]$</td>
</tr>
<tr>
<td>Mitigated PTE (tons/yr)</td>
<td>$= (\text{Maximum one-way miles (miles/yr)}) * (\text{Mitigated Emission Factor (lb/mile)}) * (\text{ton/2000 lbs})$</td>
</tr>
</tbody>
</table>

**Abbreviations**

- PM = Particulate Matter  
- PM10 = Particulate Matter (<10 um)  
- PM2.5 = Particulate Matter (<2.5 um)  
- PTE = Potential to Emit
Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Hoosier Metal Polish
Source Location: 304 N. Fairground Rd., Kentland, IN 47951
Permit No.: F111-41715-00029
Reviewer: Alexandrea Neuzerling

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 of Loaded Vehicle (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>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Passenger Vehicle (entering plant) (one-way trip)</td>
<td>20.0</td>
<td>2.0</td>
<td>40.0</td>
<td>2.5</td>
<td>100.0</td>
<td>230</td>
<td>0.044</td>
<td>1.7</td>
<td>636.0</td>
</tr>
<tr>
<td>Passenger Vehicle (leaving plant) (one-way trip)</td>
<td>20.0</td>
<td>2.0</td>
<td>40.0</td>
<td>2.5</td>
<td>100.0</td>
<td>230</td>
<td>0.044</td>
<td>1.7</td>
<td>636.0</td>
</tr>
<tr>
<td>Freight Vehicle (entering plant) (one-way trip)</td>
<td>4.0</td>
<td>1.0</td>
<td>4.0</td>
<td>4.0</td>
<td>160.0</td>
<td>325</td>
<td>0.062</td>
<td>0.2</td>
<td>89.9</td>
</tr>
</tbody>
</table>

Totals 84.0 360.0 3.7 1361.8

Average Vehicle Weight Per Trip = 4.3 tons/trip
Average Miles Per Trip = 0.04 miles/trip

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

where \( k = 0.011 \) PM, 0.0022 PM10, 0.00054 PM2.5 (lb/VMT) = particle size multiplier (AP-42 Table 13.2.1-1)

\( W = 4.3 \) tons = average vehicle weight

\( sL = 9.7 \) g/m\(^2\) = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

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

where \( p = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)

\( N = 365 \) days per year

Unmitigated Emission Factor, \( E_f = 0.384 \) PM, 0.077 PM10, 0.0188 PM2.5 (lb/mile) = potential to emit

Mitigated Emission Factor, \( E_{ext} = 0.351 \) PM, 0.070 PM10, 0.0172 PM2.5 (lb/mile)

<table>
<thead>
<tr>
<th>Process</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>
</tr>
</thead>
<tbody>
<tr>
<td>Passenger Vehicle (entering plant) (one-way trip)</td>
<td>0.11</td>
<td>0.02</td>
<td>0.01</td>
</tr>
<tr>
<td>Passenger Vehicle (leaving plant) (one-way trip)</td>
<td>0.11</td>
<td>0.02</td>
<td>0.01</td>
</tr>
<tr>
<td>Freight Vehicle (entering plant) (one-way trip)</td>
<td>0.02</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Totals 0.24 0.05 0.01

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit
December 5, 2019

Hoosier Metal Polish
Mr. Eric Watt
P.O. Box 85
Kentland, IN 47951

Re: Public Notice
Hoosier Metal Polish
Permit Level: FESOP - Renewal
Permit Number: 111-41715-00029

Dear Mr. Watt:

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 Kirkland Public Library, 300 East Graham Street in Kentland, IN 47951. 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 Alexandrea Neuzerling, 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 2-6634 or dial (317) 232-6634.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
December 5, 2019

To: Kentland Jefferson Township Public Library

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

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

Applicant Name: Hoosier Metal Polish
Permit Number: 111-41715-00029

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

December 5, 2019
Hoosier Metal Polish
111-41715-00029

Dear Concerned Citizen(s):

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

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

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

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

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

Enclosure
PN AAA Cover Letter 4/12/2019
### Mail Code 61-53

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<th>Type of Mail:</th>
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<tbody>
<tr>
<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
<td>CERTIFICATE OF MAILING ONLY</td>
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<tbody>
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<td></td>
<td>Eric Watt Hoosier Metal Polish PO Box 85 Kentland IN 47951 (Source CAATS)</td>
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<td>Newton County Commissioners 201 N. 3rd Street, Courthouse Square Kentland IN 47951 (Local Official)</td>
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<td>Newton County Health Department 4117 S. 240 W. Suite 500 Morocco IN 47963 (Health Department)</td>
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<td>4</td>
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<td>Kentland Jefferson Twp Public Library 201 East Graham Street Kentland IN 47951 (Library)</td>
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<tr>
<td>5</td>
<td></td>
<td>Mr. Kenny Haun P.O. Box 280 Rensselaer IN 47978 (Affected Party)</td>
<td></td>
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<td>6</td>
<td></td>
<td>Kentland Town Council and Town Manager 300 N. 3rd St. Kentland IN 47951 (Local Official)</td>
<td></td>
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<tr>
<td>7</td>
<td></td>
<td>Patrick Mulligan 14631 S 350 W Kentland IN 47951 (Affected Party)</td>
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<td>8</td>
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<td>AgVenture D&amp;M PO Box 102 Kentland IN 47951 (Affected Party)</td>
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**Total number of pieces Listed by Sender:** 8

**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.