NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and Federally Enforceable State Operating Permit (FESOP)

for Par-Kan Company in Kosciusko County
FESOP No.: F085-42917-00012

The Indiana Department of Environmental Management (IDEM) has received an application from Par-Kan Company, located at 2915 W. 900 South, Silver Lake, IN 46982, for a new source review and FESOP. If approved by IDEM’s Office of Air Quality (OAQ), this proposed permit would allow Par-Kan Company to make certain changes at its existing source and to continue to operate its existing source. Par-Kan Company has applied to add additional emission units including a batch powder coating booth, several natural gas combustion units, a blasting operation, and welding units.

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

IDEM is aware that the batch powder coating booth, blasting operation, Lincoln welding units, and several natural gas fired combustion units were constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM’s preliminary findings have been sent to:

Warsaw Community Public Library
310 E. Main Street
Warsaw, IN 46580

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

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

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access 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 F085-42917-00012 in all correspondence.

Comments should be sent to:

Deena Levering  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Deena Levering or (317) 234-5400  
Or dial directly: (317) 234-5400  
Fax: (317) 232-6749 attn: Deena Levering  
E-mail: dleverin@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 and will also be sent to the local library indicated above, the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Deena Levering of my staff at the above address.

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

Par-Kan Company
2915 W. 900 South
Silver Lake, Indiana 46982

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

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

<table>
<thead>
<tr>
<th>Operation Permit No.: F085-42917-00012</th>
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<tbody>
<tr>
<td>Master Agency Interest ID: 10659</td>
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<table>
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<tr>
<th>Issued by:</th>
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</thead>
<tbody>
<tr>
<td>Heath Hartley, Section Chief</td>
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<tr>
<td>Permits Branch</td>
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<tr>
<td>Office of Air Quality</td>
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</table>

<table>
<thead>
<tr>
<th>Issuance Date:</th>
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</table>

<table>
<thead>
<tr>
<th>Expiration Date:</th>
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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 metal products fabrication and powder coating source, manufacturing items such as refuse and grease containers, agricultural seedway and grainway weigh wagons, and ground support equipment for airlines.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>2915 W. 900 South, Silver Lake, Indiana 46982</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(260) 352-2141</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>5084 (Industrial Machinery and Equipment)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Kosciusko</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, Minor Source, under PSD and Emission Offset Rules, Minor Source, Section 112 of the Clean Air Act, Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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

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

(a) One (1) main powder coating line, identified as PC001, constructed in 2010, consisting of four (4) spray guns, with a combined maximum capacity of 128.4 pounds per hour, with a recirculation powder collection system, using HEPA filter as control, and exhausting indoors.

(b) One (1) batch powder coating booth, identified as PC002, constructed in 2017, consisting of 1 spray gun, with a maximum capacity of 32.1 pounds per hour, with a recirculation powder collection system, using a HEPA filter as control, and exhausting indoors.

(c) Thirty-five (35) Deltaweld 452 welding units, constructed in 2010, each with a maximum capacity of 5.97 pounds of wire per hour, using no controls, and exhausting indoors.

(d) Seven (7) Lincoln welding units, constructed in 2018, each with a maximum capacity of 5.97 pounds of wire per hour, using no controls, and exhausting indoors.

(e) One (1) Abrasive blasting operation, identified as BS1, constructed in 2017, with a maximum abrasive flow rate through the nozzle of 1325.3 pounds of aluminum oxide per hour, using a filter as control, and exhausting indoors.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(1)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) natural gas-fired air make-up unit, located in the assembly area, constructed in 2010, with a maximum heat input capacity of 3.0 MMBtu per hour, using no controls, and exhausting indoors.
(b) One (1) natural gas-fired curing oven, identified as CUOV001, constructed in 2010, with a maximum heat input capacity of 4.00 MMBtu per hour, using no controls, and exhausting to stack S11.

(c) Two (2) natural gas-fired radiant tube heaters, located in back weld room, constructed in 2010, with a combined maximum heat input capacity of 0.155 MMBtu per hour, using no controls, and exhausting indoors.

(d) One (1) natural gas-fired unit heater, located in R & D, constructed in 2010, with a maximum heat input capacity of 0.175 MMBtu per hour, using no controls, and exhausting to stack S9.

(e) Two (2) grinding stations, identified as GS1, constructed in 2010, with a combined maximum capacity of 67.5 pounds of steel per hour, using no controls, and exhausting indoors.

(f) One (1) plasma table, identified as Plasma Table #1, constructed in 2010, with a maximum metal thickness of 0.92 inches and maximum metal cutting rate of 145 inches per minute, using no control, and exhausting indoors.

(g) One (1) plasma table identified as Plasma Table #2, constructed in 2010, with a maximum metal thickness of 0.92 inches and maximum metal cutting rate of 145 inches per minute, using no control, and exhausting indoors.

(h) Three (3) natural gas-fired heaters, with 2 located in saw room and 1 located in breakroom, constructed in 2020, each with a maximum heat input capacity of 0.128 MMBtu per hour, using no controls, and exhausting to stacks S10, S11, and S12.

(i) One (1) natural gas-fired heater, located in the shipping office, constructed in 2010, with a maximum heat input capacity of 0.36 MMBtu per hour, using no controls, and exhausting to stack S13.

(j) Three (3) natural gas-fired furnace, located in the office, constructed in 2010, each with a maximum heat input capacity of 0.075 MMBtu per hour, using no controls, and each exhausting to stack S18, then vented to roof.

(k) One (1) manual acetone wipe-down of products, constructed in 2017, using no controls, and exhausting indoors.

(l) Unpaved roads.

A.4 FESOP Applicability [326 IAC 2-8-2]

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

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

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

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

(a) This permit, F085-42917-00012, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

1. it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

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

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

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

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than 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) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

B.12 Emergency Provisions [326 IAC 2-8-12]

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

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

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

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

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

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

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to F085-42917-00012 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and
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 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

Entire Source

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

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

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

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

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

(a)  Pursuant to 326 IAC 2-8:

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

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

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

(b)  Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) 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(c).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.
Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

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

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

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

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

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

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.
The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

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

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

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

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

Emissions Unit Description:

(a) One (1) main powder coating line, identified as PC001, constructed in 2010, consisting of four (4) spray guns, with a combined maximum capacity of 128.4 pounds per hour, with a recirculation powder collection system, using HEPA filter as control, and exhausting indoors.

(b) One (1) batch powder coating booth, identified as PC002, constructed in 2017, consisting of 1 spray gun, with a maximum capacity of 32.1 pounds per hour, with a recirculation powder collection system, using a HEPA filter as control, and exhausting indoors.

(c) Thirty-five (35) Deltaweld 452 welding units, constructed in 2010, each with a maximum capacity of 5.97 pounds of wire per hour, using no controls, and exhausting indoors.

(d) Seven (7) Lincoln welding units, constructed in 2018, each with a maximum capacity of 5.97 pounds of wire per hour, using no controls, and exhausting indoors.

(e) One (1) Abrasive blasting operation, identified as BS1, constructed in 2017, with a maximum abrasive flow rate through the nozzle of 1325.3 pounds of aluminum oxide per hour, using a filter as control, and exhausting indoors.

Insignificant Activities:

(e) Two (2) grinding stations, identified as GS1, constructed in 2010, with a combined maximum capacity of 67.5 pounds of steel per hour, using no controls, and exhausting indoors.

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

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

D.1.1 PSD Minor Limits [326 IAC 2-2]
In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Powder Coating PC001</td>
<td>10.0</td>
</tr>
<tr>
<td>Batch Powder Coating PC002</td>
<td>2.5</td>
</tr>
<tr>
<td>Abrasive Blasting BS1</td>
<td>5.0</td>
</tr>
</tbody>
</table>

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

D.1.2 FESOP and PSD Minor Limits [326 IAC 2-8-4][326 IAC 2-2]
Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:
<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM10 Limit (lb/hr)</th>
<th>PM2.5 Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Powder Coating PC001</td>
<td>10.0</td>
<td>10.0</td>
</tr>
<tr>
<td>Batch Powder Coating PC002</td>
<td>2.5</td>
<td>2.5</td>
</tr>
<tr>
<td>Abrasive Blasting BS1</td>
<td>2.0</td>
<td>2.0</td>
</tr>
</tbody>
</table>

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

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following processes shall not exceed the pounds per hour limitation listed in the table below when operating at the associated process weight rate of tons per hour.

<table>
<thead>
<tr>
<th>Summary of Process Weight Rate Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process / Emission Unit</td>
</tr>
<tr>
<td>--------------------------------</td>
</tr>
<tr>
<td>Main Powder Coating Line</td>
</tr>
<tr>
<td>Batch Powder Booth</td>
</tr>
<tr>
<td>Abrasive Blasting</td>
</tr>
<tr>
<td>Grinding</td>
</tr>
<tr>
<td>42 Welding Units</td>
</tr>
</tbody>
</table>

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

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

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

D.1.5 Particulate Control

(a) In order to assure compliance with Conditions D.1.1, 1.2, and D.1.3 the HEPA filters for particulate control shall be in operation and control emissions from the main powder coating line and the batch powder coating booth at all times the main powder coating line and the batch powder coating booth are in operation.

(b) In order to assure compliance with Conditions D.1.1, 1.2, and D.1.3 the filter for particulate control shall be in operation and control emissions from the abrasive blasting at all times the abrasive blasting is in operation.
In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

**D.1.6 Parametric Monitoring**

(a) The Permittee shall perform quarterly inspections of the HEPA filters controlling particulate from the main powder coating line and the batch powder coating booth to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(b) The Permittee shall perform quarterly inspections of the filter controlling particulate from the abrasive blasting to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

**D.1.7 Broken or Failed Bag Detection**

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

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

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

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

**D.1.8 Record Keeping Requirement**

(a) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of the dates and results of the inspections.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Par-Kan Company
Source Address: 2915 W. 900 South, Silver Lake, Indiana 46982
FESOP Permit No.: F085-42917-00012

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) ________________________________

☐ Report (specify) ________________________________

☐ Notification (specify) ________________________________

☐ Affidavit (specify) ________________________________

☐ Other (specify) ________________________________

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

Signature: 

Printed Name: 

Title/Position: 

Date:
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) 
EMERGENCY OCCURRENCE REPORT

Source Name: Par-Kan Company 
Source Address: 2915 W. 900 South, Silver Lake, Indiana 46982 
FESOP Permit No.: F085-42917-00012 

This form consists of 2 pages 

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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
If any of the following are not applicable, mark N/A

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

Form Completed by: ________________________________________________
Title / Position: ____________________________________________________
Date: ____________________________________________________________
Phone: ___________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Par-Kan Company
Source Address: 2915 W. 900 South, Silver Lake, Indiana 46982
FESOP Permit No.: F085-42917-00012

Months: ___________ to ____________  Year: ______________

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _______________________________________________________
Title / Position: ___________________________________________________________
Date: ___________________________________________________________________
Phone: ___________________________________________________________________
Source Description and Location

Source Name: Par-Kan Company
Source Location: 2915 W. 900 South, Silver Lake, IN 46982
County: Kosciusko
SIC Code: 5084 (Industrial Machinery and Equipment)
Operation Permit No.: F 085-42917-00012
Permit Reviewer: Deena Levering

On June 1, 2020, the Office of Air Quality (OAQ) received an application from Par-Kan Company related to the construction and operation of new emission units at an existing stationary metal products fabrication and powder coating source, manufacturing items such as refuse and grease containers, agricultural seedway and grainway weigh wagons, and ground support equipment for airlines and transition from a Minor Source Operating Permit (MSOP) to a FESOP.

Existing Approvals

The source has been operating under MSOP No. 085-29254-00012, issued on September 28, 2010.

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

County Attainment Status

The source is located in Kosciusko County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO2</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O3</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM2.5</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM2.5 standard.</td>
</tr>
<tr>
<td>PM10</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO2</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO2 standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(b) PM$_{2.5}$
Kosciusko County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Kosciusko 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](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.

### Emission Units and Pollution Control Equipment

**Constructed Under the Provisions of 326 IAC 2-1.1-3 (Exemptions)**

The following existing emissions unit(s), constructed under the provisions of 326 IAC 2-1.1-3 (Exemptions), are being incorporated in the permit as part of this permitting action:

#### Project #1 (2018)

(a) Seven (7) Lincoln welding units, constructed in 2018, each with a maximum capacity of 5.97 pounds of wire per hour, using no controls, and exhausting indoors.

#### Project #2 (2020)

(a) Three (3) natural gas-fired heaters, with 2 located in saw room and 1 located in basement, constructed in 2021, each with a maximum heat input capacity of 0.128 MMBtu per hour, using no controls, and exhausting to stacks S10, S11, and S12.

The total potential to emit of each project is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) and the addition of the emission units did not require the source to transition to a higher operation
permit level. Therefore, pursuant to 326 IAC 2-1.1-3(e), the permit revision requirements under 326 IAC 2-8-11.1, including the requirement to submit an application, do not apply to these emission units. See Appendix A of this Technical Support Document for detailed emission calculations.

### Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Par-Kan Company on June 1, 2020, relating to the transition from MSOP to FESOP due to the change in emission units.

The source consists of the following existing emission unit(s):

(a) One (1) main powder coating line, identified as PC001, constructed in 2010, consisting of four (4) spray guns, with a combined maximum capacity of 128.4 pounds per hour, with a recirculation powder collection system, using a HEPA filter as control, and exhausting indoors.

(b) Thirty-five (35) Deltaweld 452 welding units, constructed in 2010, each with a maximum capacity of 5.97 pounds of wire per hour, using no controls, and exhausting indoors.

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

(c) One (1) batch powder coating booth, identified as PC002, constructed in 2017, consisting of 1 spray gun, with a maximum capacity of 32.1 pounds per hour, with a recirculation powder collection system, using a HEPA filter as control, and exhausting indoors.

(d) One (1) Abrasive blasting operation, identified as BS1, constructed in 2017, with a maximum abrasive flow rate through the nozzle of 1325.3 pounds of aluminum oxide per hour, using a filter as control, and exhausting indoors.

(e) Two (2) grinding stations, identified as GS1, constructed in 2010, with a combined maximum capacity of 67.5 pounds of steel per hour, using no controls, and exhausting indoors.

(f) One (1) plasma table, identified as Plasma Table #1, constructed in 2010, with a maximum metal thickness of 0.92 inches and maximum metal cutting rate of 145 inches per minute, using no control, and exhausting indoors.

(g) One (1) plasma table identified as Plasma Table #2, constructed in 2010, with a maximum metal thickness of 0.92 inches and maximum metal cutting rate of 145 inches per minute, using no control, and exhausting indoors.

(h) One (1) natural gas-fired heater, located in the shipping office, constructed in 2010, with a maximum heat input capacity of 0.36 MMBtu per hour, using no controls, and exhausting to stack S13.

(i) Three (3) natural gas-fired furnace, located in the office, constructed in 2010, each with a maximum heat input capacity of 0.075 MMBtu per hour, using no controls, and each exhausting to stack S18, then vented to roof.

(j) One (1) manual acetone wipe-down of products, constructed in 2017, using no controls, and exhausting indoors.

The source also consists of the following insignificant activities:

(k) One (1) natural gas-fired air make-up unit, located in the steel storage area, constructed in 2010, with a maximum heat input capacity of 3.0 MMBtu per hour, using no controls, and indoors.
(l) One (1) natural gas-fired curing oven, identified as CUOV001, constructed in 2010, with a maximum heat input capacity of 4.00 MMBtu per hour, using no controls, and exhausting to stack S11.

(m) Two (2) natural gas-fired radiant tube heaters, located in back weld room, constructed in 2010, with a combined maximum heat input capacity of 0.155 MMBtu per hour, using no controls, and exhausting indoors.

(n) One (1) natural gas-fired unit heater, located in R & D, constructed in 2010, with a maximum heat input capacity of 0.175 MMBtu per hour, using no controls, and exhausting to stack S9.

**Enforcement Issues**

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

In accordance with 326 IAC 2-6.1-7(b), a timely renewal application is one that is submitted at least one hundred twenty (120) calendar days prior to the expiration date of the source’s existing operating permit. This source’s existing permit expired on September 28, 2020. The source’s permit renewal application was not received by IDEM until June 1, 2020. IDEM is reviewing this matter and will take appropriate action.

**Emission Calculations**

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

**Permit Level Determination – FESOP**

This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Unrestricted Source-Wide Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$^1$</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives$^*$</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

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

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

$^*$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$_{2.5}$ are each equal to or greater than one hundred (100) tons per year. The potential to emit of all other regulated air pollutants is less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State
Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>88.08</td>
<td>75.14</td>
<td>75.14</td>
<td>0.02</td>
<td>3.63</td>
<td>0.20</td>
<td>3.05</td>
<td>0.61</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
</tr>
</tbody>
</table>

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

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

The source opted to take PM, PM₁₀, and PM₂.₅ limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP), for more information regarding the limit(s).

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

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

### Federal Rule Applicability Determination

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

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

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in
the permit for the natural gas combustion units, because none of these natural gas combustion units are steam generating units as defined in Section 60.41c Definitions.

(b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture 40 CFR 60, Subpart EE and 326 IAC 12, are not included in the permit for this source, because this source does not coat metal furniture. This source manufactures metal refuse container products and uses powder coating to coat the containers.

(c) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS and 326 IAC 12, are not included in the permit for this source, because this source does not coat large appliances as defined in Section 60.451 Definitions. This source manufactures and powder coats refuse containers products.

(d) 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 this source, since this source is a powder coating operation.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDDD and 326 IAC 20-95 are not included in the permit for the natural gas combustion units, since these units are not located or part of a major source of HAPs.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources 40 CFR 63, Subpart HHHHHH are not included in the permit for this source, since this source does not perform paint stripping using materials that contain methylene chloride (MeCl), the source does not conduct any autobody refinishing, and the source does not use any spray coatings containing chromium, lead, manganese, nickel, or cadmium.

(d) 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 combustion units, since these emission units are not boilers as defined in Section 63.11237 Definitions.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories 40 CFR 63, Subpart Xxxxxxx (6X) are not included in the permit for this source. Although this source is primarily engaged in fabricating metal products, none of the dry abrasive blasting, machining, dry grinding, or welding use materials that contain metal fabrication or finishing metal HAPs (MFHAP). The type of operations performed at this source are not included under this rule. The SIC code of this source is 5084.

(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):

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

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

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD, and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Powder Coating Line PC001</td>
<td>10.0</td>
</tr>
<tr>
<td>Batch Powder Coating Line PC002</td>
<td>2.5</td>
</tr>
<tr>
<td>Abrasive Blasting BS1</td>
<td>5.0</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 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 operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, Clark, or Floyd County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section of this document.

FESOP PM10, and PM2.5 Limit(s)
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM10 Limit (lb/hr)</th>
<th>PM2.5 Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Powder Coating Line PC001</td>
<td>10.0</td>
<td>10.0</td>
</tr>
<tr>
<td>Batch Powder Coating Line PC002</td>
<td>2.5</td>
<td>2.5</td>
</tr>
<tr>
<td>Abrasive Blasting BS1</td>
<td>2.0</td>
<td>2.0</td>
</tr>
</tbody>
</table>

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.
326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

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

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

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

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

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Kosciusko 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 Kosciusko 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 Kosciusko 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 for this source has been reviewed as follows:

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas emission units are each not subject to the requirements of 326 IAC 6-2-4, since they are each direct fired emission units.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
(a) Pursuant to 326 IAC 6-3-1(b)(14), the plasma tables, and the laser cut table are each not subject to the requirements of 326 IAC 6-3, since they each have potential particulate emissions less than 0.551 pound per hour.

(b) Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the following emission units, 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).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the following processes shall not exceed the pounds per hour listed in the table below when operating at the associated process weight rate tons per hour. The pound per hour limitation was calculated with the following equation:
Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

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

### Summary of Process Weight Rate Limits

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
<th>Uncontrolled PTE (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Powder Coating Line</td>
<td>0.06</td>
<td>0.65</td>
<td>38.52</td>
</tr>
<tr>
<td>Batch Powder Booth</td>
<td>0.02</td>
<td>0.26</td>
<td>9.63</td>
</tr>
<tr>
<td>Abrasive Blasting</td>
<td>0.34</td>
<td>1.99</td>
<td>13.25</td>
</tr>
<tr>
<td>Grinding</td>
<td>0.03</td>
<td>0.42</td>
<td>1.15</td>
</tr>
<tr>
<td>42 Welding Units</td>
<td>0.34</td>
<td>1.98</td>
<td>1.15</td>
</tr>
</tbody>
</table>

The HEPA filter shall be in operation at all times the main powder coating line and the batch powder booth are in operation, in order to comply with this limit. The filter shall be in operation at all times the abrasive blasting is in operation in order to comply with this limit.

### 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The natural gas combustion units are not subject to 326 IAC 7-1.1 because they have 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 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-1, the manual acetone wipe-down of products is not subject to the requirements of 326 IAC 8-3-2, since it is a manual operations involving wipes.

### Compliance Determination and Monitoring Requirements

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

   (1) IDEM OAQ has determined that testing of the abrasive blasting unit and powder coating lines is not required at this time to determine compliance with the particulate emission limits. IDEM has the authority to require testing at a later time if necessary, to demonstrate compliance with any applicable requirement.

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

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>HEPA Filters</td>
<td>Baghouse Inspections</td>
<td>Quarterly</td>
<td>Verify that it is operated and maintained per manufacturer's specifications</td>
</tr>
<tr>
<td>Abrasive Blasting Filter</td>
<td>Baghouse Inspections</td>
<td>Quarterly</td>
<td>Verify that it is operated and maintained per manufacturer's specifications</td>
</tr>
</tbody>
</table>
These monitoring conditions are necessary because the HEPA filters for the main powder coating line and the batch powder booth must operate properly to assure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-8-4 (FESOP) and 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes).

### 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 June 1, 2020.

The construction of the proposed new and modified emission units and the operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. 085-42917-00012. The staff recommends to the Commissioner that the New Source Review and FESOP be approved.

### IDEM Contact

(a) If you have any questions regarding this permit, please contact Deena Levering, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-5400 or (800) 451-6027, and ask for Deena Levering or (317) 234-5400.

(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).
## Appendix A: Emission Calculations

### PTE Summary of the Modification

**Company Name:** Par-Kan Company  
**Source Address:** 2915 W. 900 South, Silver Lake, IN 46982  
**Permit Number:** F085-42917-00012  
**Reviewer:** Deena Levering

### Uncontrolled Potential to Emit of the Emission Units Constructed in 2010 (tons/yr)

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs**</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grinding</td>
<td>5.03</td>
<td>5.03</td>
<td>5.03</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>NG Units</td>
<td>4.77E-03</td>
<td>0.02</td>
<td>0.02</td>
<td>1.51E-03</td>
<td>0.25</td>
<td>0.01</td>
<td>0.21</td>
<td>4.74E-03</td>
</tr>
<tr>
<td>Plasma Tables</td>
<td>0.28</td>
<td>0.28</td>
<td>0.28</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>5.31</td>
<td>5.32</td>
<td>5.32</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>-- **</td>
</tr>
</tbody>
</table>

*PM2.5 listed is direct PM2.5  
**Fugitive HAP emissions are always included in the source-wide emissions

Source-Wide Total HAPs: 4.74E-03
## Appendix A: Emission Calculations

### PTE Summary

**Company Name:** Par-Kan Company  
**Source Address:** 2915 W. 900 South, Silver Lake, IN 46982  
**Permit Number:** F085-42917-00012  
**Reviewer:** Deena Levering

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

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs**</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Powder Coating Line</td>
<td>168.72</td>
<td>168.72</td>
<td>168.72</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Batch Powder Coating Booth</td>
<td>42.18</td>
<td>42.18</td>
<td>42.18</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Grinding</td>
<td>5.03</td>
<td>5.03</td>
<td>5.03</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Welding Plasma and Laser Cut Tables</td>
<td>6.33</td>
<td>6.33</td>
<td>6.33</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Abrasive Blasting BS1</td>
<td>58.05</td>
<td>40.63</td>
<td>40.63</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>NG Combustion Existing Units</td>
<td>0.06</td>
<td>0.24</td>
<td>0.24</td>
<td>0.02</td>
<td>3.21</td>
<td>0.18</td>
<td>2.70</td>
<td>0.06</td>
</tr>
<tr>
<td>NG Combustion 2010 Units</td>
<td>0.00</td>
<td>0.02</td>
<td>0.02</td>
<td>0.00</td>
<td>0.25</td>
<td>0.01</td>
<td>0.21</td>
<td>0.00</td>
</tr>
<tr>
<td>NG Combustion New Units</td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
<td>0.00</td>
<td>0.16</td>
<td>0.01</td>
<td>0.14</td>
<td>0.00</td>
</tr>
<tr>
<td>Manual Acetone Wipe-down1</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total Excluding Fugitives</strong></td>
<td>280.37</td>
<td>263.16</td>
<td>263.16</td>
<td>0.02</td>
<td>3.63</td>
<td>0.20</td>
<td>3.05</td>
<td>--</td>
</tr>
<tr>
<td><strong>Fugitive Emissions</strong></td>
<td>1.41</td>
<td>0.38</td>
<td>0.04</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total Fugitives</strong></td>
<td>1.41</td>
<td>0.38</td>
<td>0.04</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

*PM2.5 listed is direct PM2.5  
**Fugitive HAP emissions are always included in the source-wide emissions  
The manual acetone wipe-down operation is considered to have negligible emissions.

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

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5 *</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs**</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Powder Coating Line</td>
<td>43.80</td>
<td>43.80</td>
<td>43.80</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Batch Powder Coating Booth</td>
<td>10.95</td>
<td>10.95</td>
<td>10.95</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Grinding</td>
<td>5.03</td>
<td>5.03</td>
<td>5.03</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Welding Plasma and Laser Cut Tables</td>
<td>6.33</td>
<td>6.33</td>
<td>6.33</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Abrasive Blasting BS1</td>
<td>21.90</td>
<td>8.76</td>
<td>8.76</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>NG Combustion Existing Units</td>
<td>0.06</td>
<td>0.24</td>
<td>0.24</td>
<td>0.02</td>
<td>3.21</td>
<td>0.18</td>
<td>2.70</td>
<td>0.06</td>
</tr>
<tr>
<td>NG Combustion 2010 Units</td>
<td>0.00</td>
<td>0.02</td>
<td>0.02</td>
<td>0.00</td>
<td>0.25</td>
<td>0.01</td>
<td>0.21</td>
<td>0.00</td>
</tr>
<tr>
<td>NG Combustion New Units</td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
<td>0.00</td>
<td>0.16</td>
<td>0.01</td>
<td>0.14</td>
<td>0.00</td>
</tr>
<tr>
<td>Manual Acetone Wipe-down1</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total Excluding Fugitives</strong></td>
<td>88.08</td>
<td>75.14</td>
<td>75.14</td>
<td>0.02</td>
<td>3.63</td>
<td>0.20</td>
<td>3.05</td>
<td>--</td>
</tr>
<tr>
<td><strong>Fugitive Emissions</strong></td>
<td>1.41</td>
<td>0.38</td>
<td>0.04</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Total Fugitives</strong></td>
<td>1.41</td>
<td>0.38</td>
<td>0.04</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

*PM2.5 listed is direct PM2.5  
**Fugitive HAP emissions are always included in the source-wide emissions  
The manual acetone wipe-down operation is considered to have negligible emissions.
## Appendix A: Emission Calculations
### Powder Coating

**Company Name:** Par-Kan Company  
**Source Address:** 2915 W. 900 South, Silver Lake, IN 46982  
**Permit Number:** F085-42917-00012  
**Reviewer:** Deena Levering

<table>
<thead>
<tr>
<th>Emission Units/Processes</th>
<th>No. of Powder Coating Guns</th>
<th>Powder Gun Rate (lb/min)</th>
<th>Max. Hourly Material Usage (lb/hr)</th>
<th>Control Efficiency</th>
<th>Transfer Efficiency</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5 (ton/yr)</th>
<th>Controlled Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Controlled Potential to Emit PM/PM10/PM2.5 (ton/yr)</th>
<th>Limited Potential to Emit PM/PM10/PM2.5 (lb/hr)</th>
<th>Limited Potential to Emit PM/PM10/PM2.5 (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Powder Coating Line</td>
<td>4</td>
<td>0.535</td>
<td>128.40</td>
<td>99.5%</td>
<td>70%</td>
<td>38.52</td>
<td>168.72</td>
<td>0.19</td>
<td>0.84</td>
<td>10.00</td>
<td>43.80</td>
</tr>
<tr>
<td>Batch Powder Coating Booth</td>
<td>1</td>
<td>0.535</td>
<td>32.10</td>
<td>99.5%</td>
<td>70%</td>
<td>9.63</td>
<td>42.18</td>
<td>0.05</td>
<td>0.21</td>
<td>2.50</td>
<td>10.95</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>48.15</strong></td>
<td><strong>210.90</strong></td>
<td><strong>0.24</strong></td>
<td><strong>1.05</strong></td>
<td><strong>12.50</strong></td>
<td><strong>54.75</strong></td>
</tr>
</tbody>
</table>

### Notes:
1. The plant does not have an automatic powder coating line, they are conducted manually. Thus the maximum number of product painted per year takes into account the preparation time, cleaning time, and color changes.
2. The powder coating operations are conducted on a “mainline” utilizing conveyor transfer and 4 Wagner spray guns and a batch booth (non-conveyorized) equipped with a single manual spray gun. Based on manufacturer specifications, the filters can reduce waste by 99.5%.
3. The materials contain no HAPs.

### Methodology:
Max. Hourly Material Usage (lb/hr) = No. of Powder Coating Stations x Powder Gun Rate (lb/min) x 60min/1hr  
Uncontrolled Potential to Emit PM/PM10/PM2.5 (lbs/hr) = Max. Hourly Usage (lb/hr) x (1 - Transfer Efficiency (%))  
Uncontrolled Potential to Emit PM/PM10/PM2.5 (tons/yr) = Uncontrolled Potential to Emit PM/PM10/PM2.5 (lbs/hr) x 8760hr/1yr x 1ton/2000lbs  
Controlled Potential to Emit PM/PM10/PM2.5 (lbs/hr) = Uncontrolled Potential to Emit PM/PM10/PM2.5 (lbs/hr) x (1-Control Efficiency (%))  
Controlled Potential to Emit PM/PM10/PM2.5 (tons/yr) = Controlled Potential to Emit PM/PM10/PM2.5 (lbs/hr) x 8760hr/1yr x 1ton/2000lbs
Appendix A: Emission Calculations
326 IAC 6-3-2 Applicability

Company Name: Par-Kan Company
Source Address: 2915 W. 900 South, Silver Lake, IN 46982
Permit Number: F085-42917-00012
Reviewer: Deena Levering

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
<th>Uncontrolled PM (lb/hr)</th>
<th>Controls Needed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Powder Coating Line</td>
<td>0.06</td>
<td>0.65</td>
<td>38.52</td>
<td>Y</td>
</tr>
<tr>
<td>Batch Powder Booth</td>
<td>0.02</td>
<td>0.26</td>
<td>9.63</td>
<td>Y</td>
</tr>
<tr>
<td>Grinding</td>
<td>0.03</td>
<td>0.42</td>
<td>1.15</td>
<td>Y</td>
</tr>
<tr>
<td>42 Welding Units*</td>
<td>0.34</td>
<td>1.98</td>
<td>1.15</td>
<td>N</td>
</tr>
<tr>
<td>Abrasive Blasting*</td>
<td>0.34</td>
<td>1.99</td>
<td>13.25</td>
<td>Y</td>
</tr>
<tr>
<td>Plasma Table #1**</td>
<td>N/A</td>
<td>N/A</td>
<td>0.03</td>
<td>N/A</td>
</tr>
<tr>
<td>Plasma Table #2**</td>
<td>N/A</td>
<td>N/A</td>
<td>0.03</td>
<td>N/A</td>
</tr>
<tr>
<td>Future Laser Cut Table</td>
<td>N/A</td>
<td>N/A</td>
<td>0.00</td>
<td>N/A</td>
</tr>
</tbody>
</table>

E = 4.10P^0.67

Where

E = rate of emission in pounds per hour
P = process weight rate in tons per hour

*The heaviest item manufactured at the source weighs 5400 pounds and only 0.125 parts per hour are completed.
P (ton/hr) = 5400 (pounds/part) x 0.125 (part/hr) x 1ton/2000 lbs

The plasma tables and the laser cut table are not subject to 326 IAC 6-3-2, since they have uncontrolled potential emissions less than 0.551 pound per hour.
Appendix A: Emissions Calculations  
Particulate Matter Emissions

Company Name: Par-Kan Company  
Source Address: 2915 W. 900 South, Silver Lake, IN 46982  
Permit Number: F085-42917-00012  
Reviewer: Deena Levering

<table>
<thead>
<tr>
<th>Process</th>
<th>No. of Stations</th>
<th>Process Weight Rate</th>
<th>PM/PM10/PM2.5 Emission Factor</th>
<th>Uncontrolled Potential to Emit PM/PM10/PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>lbs of steel/hr</td>
<td>tons of steel/hr</td>
<td>lbs/ton</td>
</tr>
<tr>
<td>Grinding</td>
<td>2</td>
<td>67.5</td>
<td>0.034</td>
<td>17</td>
</tr>
</tbody>
</table>

Emission factor from AP-42, Ch.12.10, SCC#30400340, for cleaning and finishing of castings.

**Methodology:**

Process Weight Rate (tons of steel/hr) = Process Weight Rate (lbs of steel/hr) x 1ton/2000lbs

Uncontrolled Potential to Emit PM/PM10/PM2.5 (lbs/hr) = No. of Stations x Process Weight Rate (tons of Steel/hr) x PM/PM10/PM2.5 Emission Factor (lb/ton)

Uncontrolled Potential to Emit PM/PM10/PM2.5 (tons/yr) = Uncontrolled Potential to Emit PM/PM10/PM2.5 (lbs/hr) x 8760hr/1yr x 1ton/2000lbs
# Appendix A: Emissions Calculations
## Welding and Thermal Cutting

<table>
<thead>
<tr>
<th>Process</th>
<th>Number of Stations</th>
<th>Maximum Metal Thickness Cut (inches)</th>
<th>Maximum Metal Cutting Rate (inches/minute)</th>
<th>Maximum Metal Cutting Rate (inches/hour)</th>
<th>Emission Factors* (lb pollutant/lb electrode)</th>
<th>Potential to Emit (lbs/hr)</th>
<th>HAAPs (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metal Inert Gas (MIG) Carbon Steel</td>
<td>35</td>
<td>0.9253</td>
<td>145</td>
<td>8700</td>
<td>0.0039</td>
<td>0.031</td>
<td>0.0E+00</td>
</tr>
<tr>
<td>(35 Miller Deltaweld 452 and 7 Lincoln)</td>
<td>7</td>
<td>0.9253</td>
<td>145</td>
<td>8700</td>
<td>0.0039</td>
<td>0.031</td>
<td>0.0E+00</td>
</tr>
<tr>
<td>Plasma Table 1**</td>
<td>1</td>
<td>0.9253</td>
<td>145</td>
<td>8700</td>
<td>0.0039</td>
<td>0.031</td>
<td>0.0E+00</td>
</tr>
<tr>
<td>Plasma Table 2**</td>
<td>1</td>
<td>0.0747</td>
<td>230</td>
<td>13800</td>
<td>0.0039</td>
<td>0.004</td>
<td>0.0E+00</td>
</tr>
</tbody>
</table>

### Methodology:

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

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

Using AWS average values: \[(0.25 \text{ g/min})/(0.6 \text{ m/min}) \times (0.0032 \text{ lb/g})/(39.37 \text{ in./m}) \times (1,000 \text{ in.}) = 0.0039 \text{ lb/1,000 inches cut, 8 mm thick}\]

Plasma cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hr) x (Emission Factor, lb pollutant/1,000 inches cut, 8 mm thick)

Cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Thickness, inches) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hour) x (Emission Factor, lb pollutant/1,000 inches cut, 1" thick)

Welding: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum electrode consumption per station, lbs/hr) x (Emission Factor, lb pollutant/lb of electrode used)

Potential to Emit (lbs/day) = Potential to Emit (lbs/hr) x (24 hours/day)

Potential to Emit (tons/year) = Potential to Emit (lbs/hr) x (8,760 hours/year) x (1 ton/2,000 lbs)
Appendix A: Emission Calculations
Abrasives Blasting - Confined

Company Name: Par-Kan Company
Source Address: 2915 W. 900 South, Silver Lake, IN 46982
Permit Number: F085-42917-00012
Reviewer: Deena Levering

Table 1 - Emission Factors for Abrasives

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

Table 2 - Density of Abrasives (lb/ft³)

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

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

<table>
<thead>
<tr>
<th>Nozzle Type (diameter)</th>
<th>Internal diameter, in</th>
<th>Nozzle Pressure (psig)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 2 1/8 inch</td>
<td>0.125</td>
<td>30</td>
</tr>
<tr>
<td>No. 3 3/16 inch</td>
<td>0.1875</td>
<td>40</td>
</tr>
<tr>
<td>No. 4 1/4 inch</td>
<td>0.25</td>
<td>50</td>
</tr>
<tr>
<td>No. 5 5/16 inch</td>
<td>0.3125</td>
<td>60</td>
</tr>
<tr>
<td>No. 6 3/8 inch</td>
<td>0.375</td>
<td>70</td>
</tr>
<tr>
<td>No. 7 7/16 inch</td>
<td>0.4375</td>
<td>80</td>
</tr>
<tr>
<td>No. 8 1/2 inch</td>
<td>0.5</td>
<td>90</td>
</tr>
<tr>
<td>No. 10 5/8 inch</td>
<td>0.625</td>
<td>100</td>
</tr>
<tr>
<td>No. 12 3/4 inch</td>
<td>0.75</td>
<td>1140</td>
</tr>
<tr>
<td>No. 16 1 inch</td>
<td>1</td>
<td>2030</td>
</tr>
</tbody>
</table>

CALCULATIONS

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

FR = FR1 x (ID/ID1)^2 x (D/D1)

Potential to Emit Before Control

FR = Flow rate of actual abrasive (lb/hr) = 1325.3 lb/hr (per nozzle)

w = fraction of time of wet blasting = 0%

N = number of nozzles = 1

EF = PM emission factor for actual abrasive from Table 1 = 0.010 lb PM/lb abrasive

PM10 emission factor ratio for actual abrasive from Table 1 = 0.70 lb PM10/lb PM

Potential to Emit (before control) = EF x FR x (1 - w/200) x N = 13.253 lb/hr

Potential to Emit (after control) = [Potential to Emit (before control)] x [1 - control efficiency] = 0.13 lb/hr

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

METHODOLOGY

PM2.5 emissions assumed equal to PM10 emissions.


Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)^2 x (D/D1)

Emission Control Device Efficiency = 99.0% 99.0% 99.0%
### Emissions Calculations

#### Natural Gas Combustion Only

**MM BTU/H <100**

<table>
<thead>
<tr>
<th>Units</th>
<th>No. of Units</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Total (MMBtu/hr)</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heaters</td>
<td>3</td>
<td>0.128</td>
<td>0.384</td>
<td>PM* 1.9</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>PM10* 7.6</td>
<td>0.01</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>direct PM2.5* 7.6</td>
<td>0.01</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>SO2 0.6</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NOx 0.16</td>
<td>0.01</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>VOC 5.5</td>
<td>0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CO 84</td>
<td>0.14</td>
</tr>
<tr>
<td>Total</td>
<td>3</td>
<td></td>
<td>0.38</td>
<td><strong>see below</strong></td>
<td></td>
</tr>
</tbody>
</table>

#### HHV

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmscf</td>
</tr>
<tr>
<td>0.4</td>
<td>1020</td>
</tr>
</tbody>
</table>

**Pollutant**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx 100</th>
<th>VOC 100</th>
<th>CO 100</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
<td>0.00</td>
<td>0.16</td>
<td>0.01</td>
<td>0.14</td>
</tr>
</tbody>
</table>

**Methodology**

All emission factors are based on normal firing.

- MMBtu = 1,000,000 Btu
- MMCF = 1,000,000 Cubic Feet of Gas
- Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-01-006-02, 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/1,020 MMBtu
- Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

#### Hazardous Air Pollutants (HAPs)

**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>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in tons/yr</td>
<td>3.5E-06</td>
<td>2.0E-06</td>
<td>1.2E-04</td>
<td>0.00</td>
<td>5.6E-06</td>
<td>0.00</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>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in tons/yr</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>9.0E-06</td>
</tr>
</tbody>
</table>

**Methodology**

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: Emissions Calculations
#### Natural Gas Combustion Only

**Company Name:** Par-Kan Company  
**Source Address:** 2915 W. 900 South, Silver Lake, IN 46982  
**Permit Number:** FP85-42917-00012  
**Reviewer:** Deena Levering

<table>
<thead>
<tr>
<th>Units</th>
<th>No. of Units</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Total (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heaters</td>
<td>1</td>
<td>0.36</td>
<td>0.36</td>
</tr>
<tr>
<td>Office Furnaces</td>
<td>3</td>
<td>0.075</td>
<td>0.225</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>4</strong></td>
<td><strong>-</strong></td>
<td><strong>0.59</strong></td>
</tr>
</tbody>
</table>

*Heat Input Capacity (MMBtu/hr) = HHV Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

**Potential Emission in tons/yr**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td><strong>0.6</strong></td>
<td><strong>1020</strong></td>
<td><strong>5.0</strong></td>
<td><strong>100</strong></td>
<td><strong>5.5</strong></td>
<td><strong>84</strong></td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.  

**MMBtu = 1,000,000 Btu**  
**MMCF = 1,000,000 Cubic Feet of Gas**

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

**Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu**

**Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton**

---

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<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>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>2.1E-03</strong></td>
<td><strong>1.2E-03</strong></td>
<td><strong>7.5E-02</strong></td>
<td><strong>1.8E+00</strong></td>
<td><strong>3.4E-03</strong></td>
<td><strong>0.00</strong></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td><strong>5.3E-06</strong></td>
<td><strong>3.0E-06</strong></td>
<td><strong>1.9E-04</strong></td>
<td><strong>0.00</strong></td>
<td><strong>8.5E-06</strong></td>
<td><strong>0.00</strong></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>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>1.3E-06</strong></td>
<td><strong>2.8E-06</strong></td>
<td><strong>3.5E-06</strong></td>
<td><strong>9.5E-07</strong></td>
<td><strong>5.3E-06</strong></td>
<td><strong>1.4E-05</strong></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td><strong>5.0E-04</strong></td>
<td><strong>1.1E-03</strong></td>
<td><strong>1.4E-03</strong></td>
<td><strong>3.8E-04</strong></td>
<td><strong>2.1E-03</strong></td>
<td><strong>0.00</strong></td>
</tr>
</tbody>
</table>

**Total HAPs = 0.00**

**Worst HAP = 0.00**

Methodology is the same as above.  

The five highest organic and metal HAPs emission factors are provided above.  

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
## Emissions Calculations

### Natural Gas Combustion Only

**Company Name:** Par-Kan Company  
**Source Address:** 2915 W. 900 South, Silver Lake, IN 46982  
**Permit Number:** F085-42917-00012  
**Reviewer:** Deena Levering

### Units Summary

<table>
<thead>
<tr>
<th>Units</th>
<th>No. of Units</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Total (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heaters</td>
<td>1</td>
<td>0.175</td>
<td>0.175</td>
</tr>
<tr>
<td>Office Furnaces</td>
<td>2</td>
<td>0.155</td>
<td>0.31</td>
</tr>
<tr>
<td>Air Make-up Unit</td>
<td>1</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Curing Oven</td>
<td>1</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>5</strong></td>
<td><strong>-</strong></td>
<td><strong>7.49</strong></td>
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</tbody>
</table>

### HHV

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmscf</td>
</tr>
<tr>
<td>7.5</td>
<td>1020</td>
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</tbody>
</table>

### Pollutant Emissions

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
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</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.06</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.24</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.24</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.02</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>3.21</td>
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<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.18</td>
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<tr>
<td>CO</td>
<td>84</td>
<td>2.70</td>
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</tbody>
</table>

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.**

**PM2.5 emission factor is filterable and condensable PM2.5 combined.**

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

### Hazardous Air Pollutants (HAPs)

#### Organics

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>2.1E-03</td>
<td>6.7E-05</td>
</tr>
<tr>
<td>Dichlorobenzene</td>
<td>1.2E-03</td>
<td>3.9E-05</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.5E-02</td>
<td>2.4E-03</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.8E+00</td>
<td>0.06</td>
</tr>
<tr>
<td>Toluene</td>
<td>3.4E-03</td>
<td>1.1E-04</td>
</tr>
</tbody>
</table>

**Total - Organics:** 0.06

#### Metals

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>5.0E-04</td>
<td>1.6E-05</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.1E-03</td>
<td>4.5E-05</td>
</tr>
<tr>
<td>Chromium</td>
<td>1.4E-03</td>
<td>6.7E-05</td>
</tr>
<tr>
<td>Manganese</td>
<td>3.8E-04</td>
<td>8.6E-04</td>
</tr>
<tr>
<td>Nickel</td>
<td>2.1E-03</td>
<td>1.8E-04</td>
</tr>
</tbody>
</table>

**Total - Metals:** 0.06

**Total HAPs:** 0.06

**Worst HAP:** 0.06

Methodology all emission factors are based on normal firing. MMBlu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-001-02, 1-03-001-02, and 1-03-001-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

### Methodology

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: Par-Kan Company
Source Address: 2915 W. 900 South, Silver Lake, IN 46982
Permit Number: F085-42917-00012
Reviewer: Deena Levering

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 (miles/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>5.0</td>
<td>150.0</td>
<td>1.9</td>
<td>691.3</td>
<td>0.019</td>
<td>0.189</td>
<td>0.9</td>
<td>345.6</td>
<td></td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>5.0</td>
<td>150.0</td>
<td>1.9</td>
<td>691.3</td>
<td>0.019</td>
<td>0.189</td>
<td>0.9</td>
<td>345.6</td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>10.0</strong></td>
<td><strong>300.0</strong></td>
<td><strong>3.8</strong></td>
<td><strong>1382.6</strong></td>
<td><strong>0.038</strong></td>
<td><strong>0.378</strong></td>
<td><strong>1.8</strong></td>
<td><strong>691.2</strong></td>
<td></td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = 15.0 tons/trip
Average Miles Per Trip = 1.9 miles/trip

Unmitigated Emission Factor, $E_{f} = k*[(s/12)^a]*[(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

- $k = 4.9$ tons/mi = particle size multiplier (AP-42 Table 13.2.2.2 for Industrial Roads)
- $s = 6.0$ % = mean % silt content of unpaved roads (AP-42 Table 13.2.2.1 Iron and Steel Production)
- $a = 0.7$ = constant (AP-42 Table 13.2.2.2 for Industrial Roads)
- $W = 15.0$ tons = average vehicle weight
- $b = 0.45$ = constant (AP-42 Table 13.2.2.2 for Industrial Roads)

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

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

Mitigated Emission Factor, $E_{ext} = \frac{E}{365} \times \frac{(365 - P)}{365}$ (Equation 2 from AP-42 13.2.2)

<table>
<thead>
<tr>
<th>Process</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>0.71</td>
<td>0.19</td>
<td>0.02</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>0.71</td>
<td>0.19</td>
<td>0.02</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>1.41</strong></td>
<td><strong>0.38</strong></td>
<td><strong>0.04</strong></td>
</tr>
</tbody>
</table>

Methodology

- $\text{Total Weight driven per day (ton/day)} = \text{Maximum Weight of Loaded Vehicle (tons/trip)} \times \text{Maximum trips per day (trip/day)}$
- $\text{Maximum one-way distance (miles/day)} = \frac{\text{Maximum one-way distance (feet/trip)}}{5280 \text{ ft/mi}}$
- $\text{Average Vehicle Weight Per Trip (ton/trip)} = \frac{\text{Total Weight driven per day (ton/day)}}{\text{Maximum trips per day (trip/day)}}$
- $\text{Average Miles Per Trip (miles/trip)} = \frac{\text{Maximum one-way miles (miles/day)}}{\text{Maximum trips per day (trip/day)}}$
- $\text{Mitigated PTE (Before Control) (ton/yr)} = \frac{\text{Maximum one-way miles (miles/day)} \times \text{Mitigated Emission Factor (lb/mile)} \times \text{ton/2000 lbs}}{365}$

Abbreviations

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit
January 28, 2021

Clint Wall
Par-Kan Company
2915 W 900 S
Silver Lake, IN 46982

Re: Public Notice
Par-Kan Company
Permit Level: FESOP w/ New Srce Review
Permit Number: 085-42917-00012

Dear Mr. Wall:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM’s online searchable database: [http://www.in.gov/apps/idem/caats/](http://www.in.gov/apps/idem/caats/). Choose Search Option by Permit Number, then enter permit 42917

and

IDEM’s Virtual File Cabinet (VFC): [http://www.IN.gov/idem](http://www.IN.gov/idem). Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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](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 Warsaw Community Public Library, 310 East Main Street in Warsaw, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.
Please review the draft permit 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 Deena Levering, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5400 or dial (317) 234-5400.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 28, 2021

To: Warsaw Community 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: Par-Kan Company
Permit Number: 085-42917-00012

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

January 28, 2021
Par-Kan Company
085-42917-00012

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 Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@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.
**Mail Code 61-53**

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<th>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</th>
<th>Type of Mail: CERTIFICATE OF MAILING ONLY</th>
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<td></td>
<td>Clint Wall Par Kan Company 2915 W 900 S Silver Lake IN 46982 (Source CAATS)</td>
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<td></td>
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<td>3</td>
<td></td>
<td>Warsaw Community Public Library 310 E Main St Warsaw IN 46580-2882 (Library)</td>
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<td>4</td>
<td></td>
<td>Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)</td>
<td></td>
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<tr>
<td>5</td>
<td></td>
<td>Silver Lake Town Council P.O. Box 159 Silver Lake IN 46982 (Local Official)</td>
<td></td>
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<td>6</td>
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<td>Kosciusko County Health Department 100 W. Center Street, Room 220 Warsaw IN 46580-2877 (Health Department)</td>
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<td></td>
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<td>7</td>
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<td>Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)</td>
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<td>Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542 (Affected Party)</td>
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<td>Christina Seiler The Rochester Sentinel PO Box 260 Rochester IN 46975 (Affected Party)</td>
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<tr>
<td>10</td>
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<td>Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)</td>
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