

Mr. David L. Gawthrop
Stiles, Inc.
P.O. Box 1807
Elkhart, IN 46515

Re: **039-11367**
First Administrative Amendment to
Part 70 T039-7432-00282

Dear Mr. Gawthrop:

Stiles, Inc. was issued a permit on August 31, 1999 for a wood molding and surface coating operation. A letter requesting correction of typographical errors was received on September 22, 1999. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows:

a) Correction of condition numbers, as follows:

- 1) C.23 22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]
- 2) C.24 23 Compliance with 40 CFR 82 and 326 IAC 22-1
- 3) D.1.4 Testing Requirements [326 IAC 2-7-6(1)(6)]
The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.4 1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

b) Deletion of erroneous wording in woodworking Record Keeping Requirements, Condition D.1.9(b)(8); the source opted to do pressure drop monitoring instead of quarterly inspections:

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the dust collector stack exhaust.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain the following:
 - (1) Weekly records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).

- (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected. ~~The Permittee shall maintain records of the results of the inspections required under Condition and the dates the vents are redirected.~~
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- c) Correction of boiler emission control device description, condition numbers and wording within the boiler Record Keeping Requirements condition, and corresponding Table of Contents lines:

TABLE OF CONTENTS

- D.3.7 ~~Cyclone~~ **Fly Ash Recovery Unit** Inspections
- D.3.8 ~~Cyclone~~ **Fly Ash Recovery Unit** Failure Detection

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

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

- (c) One (1) wood fired boiler, heat input rate 2.9 MMBtu/hr, identified as EU-03, equipped with one (1) **cyclone fly ash recovery unit** identified as C3 for particulate control, exhausting through Stack B1.

Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) wood fired boiler, heat input rate 2.9 MMBtu/hr, identified as EU-03, equipped with one (1) **cyclone fly ash recovery unit** identified as C3 for particulate control, exhausting through Stack B1.

D.3.5 Particulate Matter (PM)

The **cyclone fly ash recovery unit** for PM control shall be in operation at all times when the wood fired boiler is in operation.

D.3.6 Visible Emissions Notations

- (a) Daily visible emission notations of the **cyclone fly ash recovery unit** stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month

and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.7 Cyclone Fly Ash Recovery Unit Inspections

An inspection shall be performed each calendar quarter of the ~~cyclone fly ash recovery unit~~ controlling the boiler emissions.

D.3.8 Cyclone Fly Ash Recovery Unit Failure Detection

In the event that ~~cyclone fly ash recovery unit~~ failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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).

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition ~~D.3-5~~ **3.6**, the Permittee shall maintain records of daily visible emission notations of the ~~dust collector~~ **fly ash recovery unit** stack exhaust.
 - (b) To document compliance with Condition ~~D.3-6~~ **3.7**, the Permittee shall maintain records of the results of the inspections required under Condition **3.7** and the ~~dates the vents are~~ **redirected**.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- d) Stiles, Inc. has taken a voluntary limit on the usage of hazardous air pollutants (HAPs) and consequently is not a major source for HAPs. The line regarding Section 112 of the Clean Air Act was erroneously included in the permit and has been deleted:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood molding and surface coating operation.

Responsible Official: **David L. Gawthrop, Treasurer**
Source Address: **23551 Cooper Drive, Elkhart, IN 46514**
Mailing Address: **P.O. Box 1807, Elkhart, IN 46515**
Telephone Number: **219-262-3671**
SIC Code: **2499**
County Location: **Elkhart**
County Status: **Attainment for all criteria pollutants**
Source Status: **Part 70 Permit Program**
~~Minor Source, under PSD Rules~~
~~Major Source, Section 112 of the Clean Air Act~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Vickie Cordell at (800) 451-6027, press 0 and

ask for Vickie Cordell or extension (3-1782), or dial (317) 233-1782.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

vk

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector (Greg Wingstrom)
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner
Robert Waugaman, BCA

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Stiles Incorporated
23551 Cooper Drive
Elkhart, Indiana 46514**

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

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 2-7 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.

Operation Permit No.: T039-7432-00282	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: August 31, 1999
First Administrative Amendment 039-11367	Pages Affected: 4, 5, 6, 26, 27, 28, 30, 36, 37
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Compliance Determination Requirements

- D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.2.7 Volatile Organic Compounds (VOC)
- D.2.8 Volatile Hazardous Air Pollutants (VHAP)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.9 Particulate Matter (PM)
- D.2.10 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.11 Record Keeping Requirements
- D.2.12 Reporting Requirements: PSD and VHAP Minor Source Limits

D.3 FACILITY OPERATION CONDITIONS - Wood Fired Boiler

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]
- D.3.2 Opacity Exemption [326 IAC 5-1-3]
- D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.3.5 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.3.6 Visible Emissions Notations
- D.3.7 Fly Ash Recovery Unit Inspections
- D.3.8 Fly Ash Recovery Unit Failure Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.3.9 Record Keeping Requirements

Certification

Emergency/Deviation Occurrence Report

Quarterly Report: VOC Usage - PSD Minor Limit

Quarterly Report: VHAP Usage - Minor Source Limit

Quarterly Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood molding and surface coating operation.

Responsible Official: **David L. Gawthrop, Treasurer**
Source Address: **23551 Cooper Drive, Elkhart, IN 46514**
Mailing Address: **P.O. Box 1807, Elkhart, IN 46515**
Telephone Number: **219-262-3671**
SIC Code: **2499**
County Location: **Elkhart**
County Status: **Attainment for all criteria pollutants**
Source Status: **Part 70 Permit Program**
Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) A woodworking shop, identified as EU-01, equipped with three (3) baghouse dust collectors identified as CD-01, CD-02, and CD-03 for particulate control, exhausting through Stacks D1, D2, and D3.
- (b) A wood surface coating operation, identified as EU-02, including the following:
 - (1) Six (6) lamination glue presses, exhausting through Stacks LE1 and LE4 and general ventilation (GV) fans LE2 and LE3;
 - (2) One (1) solvent stain machine using air-assisted airless spray application, identified as FE-1, using dry filters for particulate control, exhausting through Stack F1;
 - (3) One (1) fan coater application system, identified as FE-4, exhausting through Stack F4;
 - (4) One (1) Paint O'Matic machine using a vacuum coating system, identified as FE-5, exhausting through Stack F5;
 - (5) Two conveyor systems: one (1) conveyor servicing the Paint O'Matic, waterbased stainer, and fancoater, exhausting through Stacks F5 and FC6; the second conveyor servicing the solvent stain machine, exhausting through Stacks FC2 and FC3;
 - (6) Two (2) UV coaters using vacuum coating systems, identified as FE7 and FE9, exhausting through Stacks F7.1, F7.2, F9.1, F9.2, and F9.3;
 - (7) One (1) waterbased stainer using air-assisted airless spray application, identified as FE8, using dry filters for particulate control, exhausting through Stack F8.

- (c) One (1) wood fired boiler, heat input rate 2.9 MMBtu/hr, identified as EU-03, equipped with one (1) fly ash recovery unit identified as C3 for particulate control, exhausting through Stack B1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does(**do**) not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.23 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) A woodworking shop, identified as EU-01, equipped with three (3) baghouse dust collectors identified as CD-01, CD-02, and CD-03 for particulate control, exhausting through Stacks D1, D2, and D3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 15.20 pounds per hour when operating at a process weight rate of 14,141.6 pounds per hour.

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

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Opacity [326 IAC 5-1]

Pursuant to CP 039-4259, issued July 11, 1995, visible emissions from the wood working processes shall be considered in compliance with 326 IAC 6-3-2 in the absence of particulate matter compliance tests provided that visible emissions do not exceed 10% opacity. Compliance with this opacity limit will also satisfy the requirements of 326 IAC 5-1.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1)(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter (PM)

The dust collector for PM control shall be in operation at all times when the woodworking shop is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

-
- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the dust collector stack exhaust.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain the following:
- (1) Weekly records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) wood fired boiler, heat input rate 2.9 MMBtu/hr, identified as EU-03, equipped with one (1) fly ash recovery unit identified as C3 for particulate control, exhausting through Stack B1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating) particulate emissions from all facilities used for indirect heating purposes which were constructed after September 21, 1983, shall be limited by the following equation:

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

where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBTU) heat input;

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facilities permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBTU.

D.3.2 Opacity Exemption [326 IAC 5-1-3]

Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the following applies:

- (a) When building a new fire in a boiler, or shutting down a boiler, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four (24) hour period.
- (b) If this facility cannot meet the opacity limitations in (a) of this condition, the Permittee may submit a written request to IDEM, OAM, for a temporary alternative opacity limitation in accordance with 326 IAC 5-1-3(d). The Permittee must demonstrate that the alternative limit is needed and justifiable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1)(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Particulate Matter (PM)

The fly ash recovery unit for PM control shall be in operation at all times when the wood fired

boiler is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

- (a) Daily visible emission notations of the fly ash recovery unit stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.7 Fly Ash Recovery Unit Inspections

An inspection shall be performed each calendar quarter of the fly ash recovery unit controlling the boiler emissions.

D.3.8 Fly Ash Recovery Unit Failure Detection

In the event that fly ash recovery unit failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have 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).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the fly ash recovery unit stack exhaust.
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.