

Mr. Dewayne Zint
Indian Industries, Inc., dba Escalade Sports
P. O. Box 889
Evansville, Indiana 47706-0889

Re: 163-11792-00008
First Minor Permit Modification to
Part 70 No.: T163-7324-00008

Dear Mr. Zint :

Indian Industries, Inc., dba Escalade Sports, located at 817 Maxwell Avenue, Evansville, Indiana 47706, was issued a permit on March 18, 1999 for a sporting and athletic goods production plant. A letter requesting changes to this permit was received on January 19, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of a source modification that is exempted from preconstruction approval, and the inclusion of the insignificant activities listed in the Part 70 Technical Support Document but were not in the issued Part 70 permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification 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 Aida De Guzman, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for (Aida De Guzman) or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

APD

cc: File -Vanderburgh County
U.S. EPA, Region V
Vanderburgh County Health Department
Evansville EPA
Air Compliance Section Inspector -Scott Anslinger
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and the
Evansville Environmental Protection Agency**

**Indian Industries, Inc., dba Escalade Sports
817 Maxwell Avenue
Evansville, Indiana 47711**

(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 and 326 IAC 2-1-3.2 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.: T163-7324-00008	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:
1 st Minor Permit Modification 163-11792-00008	Pages Affected: 6, 7 & 8
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Management	

- (2) The following surface coating operations at the Archery Spray Booth production line identified as Unit# ASB:
 - (a) one (1) dip tank and spray operation, identified as AO326, with a maximum capacity of coating 90 fiberglass bow limbs and quivers or 75 metal bow handles per hour, utilizing dry filters for overspray control, and exhausting through one (1) stack S/V ID: AO326s);
 - (b) one (1) surface coating booth, identified as AO311, with a maximum capacity of coating 135 fiberglass bow limbs per hour, utilizing HVLP application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: AO311s).
- (3) One (1) archery fiberglass string roving bow molding operation, identified as Unit# ABM, with a maximum capacity of producing 99 bows per hour, consisting of four (4) resin mix tanks exhausting through one (1) stack (S/V ID: A0053s), four (4) wrapping stations, and four (4) heated bow mold presses, each exhausted inside the plant;
- (4) The following significant machining operations:
 - (a) one (1) pool mill shoda router, with a maximum throughput of 1,250 pounds of particle board per hour; utilizing a dust collector (0429) for particulate control, and exhausting through one (1) stack (S/V ID: 0429s);
 - (b) one (1) basketball area powermatic CNC router, with a maximum throughput of 2,500 pounds of particle and acrylic board per hour, utilizing a baghouse (0330) for particulate control, and exhausting through one (1) stack (S/V ID: 0330s); and
 - (c) one (1) archery machining operation, and one (1) pool mill machining operation, with a total maximum throughput of 22,000 pounds of fiberglass and particle board per hour, all utilizing one (1) baghouse (0329) for particulate control, and exhausting through one (1) stack (S/V ID: 0329s).
- (5) The fiberglass basketball backboard closed sheet molding production line identified as Unit# B-1 consisting of the following equipment:
 - (a) one (1) 1000 ton W&W press, with a maximum capacity of producing 30 backboards per hour, exhausting inside the plant;
 - (b) one (1) 500 ton Onsrud press, with a maximum capacity of producing 7 backboards per hour, exhausting inside the plant; and
 - (c) one (1) 508 ton French press, with a maximum capacity of producing 8 backboards per hour, exhausting inside the plant.
 - (d) The addition of one (1) new fiberglass basketball acrylic backboards gluing operation, which has a capacity to glue a maximum of 20 backboards per hour, utilizing a special type spray gun, exhausting inside the building.

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):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (mmBtu/hr):
 - (a) one (1) T-1 table tennis oven, 1.20 mmBtu/hr;
 - (b) one (1) B0105 BB burn-off oven, 0.50 mmBtu/hr;
 - (c) one (1) B0632 BB area 0.51 mmBtu/hr twin chamber, twin burner bake off oven;
 - (d) one (1) Mask washer oven, 0.48 mmBtu/hr;
 - (e) four (4) space heaters each rated at 5.50 mmBtu/hr;
 - (f) one (1) space heater, 4.40 mmBtu/hr;
 - (g) one (1) BB area washer burner, 3.44 mmBtu/hr; and
 - (h) one (1) BB area dryoff and curing oven, 4.00 mmBtu/hr.
- (2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. (Oil House Dispensing Room #1 and #2 - 55 gallon drums)
- (3) Machining where an aqueous cutting coolant continuously floods the machining interface. (CNC Archery machining area)
- (4) Degreasing operations that do not exceed 145 gallons (not to include waste solvent shipped off-site) per twelve (12) months, except if subject to 326 IAC 20-6.
 - (a) Three (3) Safety-Kleen parts cleaner-wash tanks
- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (a) Weld wire (1) in basketball and (1) in Dept. 100.
- (6) Infrared cure equipment. (Basketball area)
- (7) Exposure chambers for curing of UV inks and UV coatings where heat is intended to discharge. (UV Oven in pool mill room)
- (8) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (9) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (Edge-banding table tennis paint line)
- (10) Paved and unpaved roads and parking lots with public access.
- (11) On-site fire and emergency response training approved by the department.
- (12) 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.
- (13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C. (Archery bow molding and 1000 ton BB press)
- (14) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - (a) Wall vent for laminator in pool mill room; and
 - (b) Three (3) basketball UV ovens with two (2) stacks.

- (15) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs:
 - (a) Honeycomb pool table bed assembly (glue machine).
- (16) Other activities or categories not previously identified:
 - (a) one (1) corn cob vibratory polisher (Archery);
 - (b) one (1) blister packaging machine with odor control hood (Archery);
 - (c) two (2) basketball backboard isocyanate foam presses exhausting through one (1) stack;
 - (d) two (2) basketball backboard powder coating lines, each operating within a fully enclosed, fully air-conditioned system for the capture and recycling of powder;
 - (e) one (1) five-stage washer located in the basketball manufacturing area.

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).

**Indiana Department of Environmental Management
Office of Air Management
and Evansville EPA**

**Technical Support Document (TSD) for a Minor Permit Modification to a
Part 70 Operating Permit**

Source Background and Description

Source Name:	Indian Industries, Inc., dba Escalade Sports
Source Location:	817 Maxwell Avenue, Evansville, Indiana 47711
County:	Vanderburgh
SIC Code:	3949
Operation Permit No.:	T163-7324-00008
Operation Permit Issuance Date:	March 18, 1999
Minor Permit Modification No.:	163-11792-00008
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed a modification application from Indian Industries, Inc., dba Escalade Sports relating to the following source modification that is exempted from preconstruction approval. The source operates a sporting and athletic goods production plant:

- (a) The addition of one (1) fiberglass basketball acrylic backboards gluing operation, which has a capacity to glue a maximum of 20 backboards per hour, utilizing a special type spray gun, exhausting inside the building; and
- (b) The inclusion of the following insignificant activities listed in the Part 70 Technical Support Document but were not in the Part 70 permit (deletions are struck through).
 - (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (mmBtu/hr):
 - (a) one (1) T-1 table tennis oven, 1.20 mmBtu/hr;
 - (b) one (1) B0105 BB burn-off oven, 0.50 mmBtu/hr;
 - (c) one (1) B0632 BB area 0.51 mmBtu/hr twin chamber, twin burner bake off oven;
 - (d) one (1) Mask washer oven, 0.48 mmBtu/hr;
 - (e) four (4) space heaters each rated at 5.50 mmBtu/hr;
 - (f) one (1) space heater, 4.40 mmBtu/hr;
 - ~~(g) one (1) #46 powder coat line heater, 2.00 mmBtu/hr;~~
 - (h) one (1) BB area washer burner, 3.44 mmBtu/hr; and
 - ~~(i) one (1) BB area washer burner, 2.00 mmBtu/hr; and~~
 - (j) one (1) BB area dryoff and curing oven, 4.00 mmBtu/hr.
 - (2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. (Oil House Dispensing Room #1 and #2 - 55 gallon drums)
 - (3) Machining where an aqueous cutting coolant continuously floods the machining interface. (CNC Archery machining area)
 - (4) Degreasing operations that do not exceed 145 gallons (not to include waste solvent shipped off-site) per twelve (12) months, except if subject to 326 IAC 20-6.

- (a) Three (3) Safety-Kleen parts cleaner-wash tanks
- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (a) Weld wire (1) in basketball and (1) in Dept. 100.
- (6) Infrared cure equipment. (Basketball area)
- (7) Exposure chambers for curing of UV inks and UV coatings where heat is intended to discharge. (UV Oven in pool mill room)
- (8) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (9) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (Edge-banding table tennis paint line)
- (10) Paved and unpaved roads and parking lots with public access.
- (11) On-site fire and emergency response training approved by the department.
- (12) 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.
- (13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C. (Archery bow molding and 1000 ton BB press)
- (14) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - (a) Wall vent for laminator in pool mill room; and
 - (b) Three (3) basketball UV ovens with two (2) stacks.
- (15) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs:
 - (a) Honeycomb pool table bed assembly (glue machine).
- (16) Other activities or categories not previously identified:
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 - (b) one (1) blister packaging machine with odor control hood (Archery);
 - (c) two (2) basketball backboard isocyanate foam presses exhausting through one (1) stack;
 - (d) two (2) basketball backboard powder coating lines, each operating within a fully enclosed, fully air-conditioned system for the capture and recycling of powder;
 - (e) one (1) five-stage washer located in the basketball manufacturing area.

History

On January 19, 2000, Indian Industries, Inc., dba Escalade Sports, submitted an application to the OAM requesting to add a basketball backboard gluing line to their existing plant, and the inclusion of the insignificant activities listed in the Part 70 Technical Support Document but were not in the issued Part 70 permit. Indian Industries, Inc., dba Escalade Sports was issued a Part 70 permit on March 18, 1999.

Recommendation

The staff recommends to the Commissioner that the Minor Permit be approved. This recommendation is based on the following facts and conditions:

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 January 19, 2000. Additional information was received on February 2, 2000.

Emission Calculations

(a) New Basketball Backboard Gluing Emissions:

Facility	Throughput (backboards/year)	Adhesive Usage (lb/backboard)	% VOC/HAP by weight	% VOC/HAP Flash Off	VOC/HAP Emissions (tons/year)
Acrylic Backboard Gluing	175,200	0.0625	85%	5%	0.24
TOTAL					0.24

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	0.24
CO	0.0
NO _x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Methyl Methacrylate	0.24
TOTAL	0.24

Justification for Modification

The Title V permit is being modified through a Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(c)(1)(B), where the construction of an additional basketball backboard gluing operation is “exempt from preconstruction approval”.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Basketball backboard gluing operation	0.0	0.0	0.0	0.24	0.0	0.0	0.24
Total Emissions	0.0	0.0	0.0	0.24	0.0	0.0	0.24

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) New Source Performance Standards (NSPS):
 There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):
 There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

- (a) 326 IAC 2-6 (Emission Reporting)
 This modification will not make the source subject to 326 IAC 2-6. However, the source, which is located in Vanderburgh County is already subject to 326 IAC 2-6 because it is a Title V source, emitting greater than 100 tons of VOC per year.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

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

- (1) Opacity shall not exceed an average of forty percent (40%) 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.

State Rule Applicability - Individual Facilities

- (a) There are no provisions under 326 IAC 8 that applies to the basketball backboard gluing operation, because it is not among the specific sources that are subject in 326 IAC 8.
- (b) 326 IAC 8-1-6 (General Reduction Requirements)
This rule applies to new facilities as January 1, 1980, which have potential VOC emissions of 25 tons per year, located anywhere in the state, which are not otherwise regulated by other provisions of this article 326 IAC 8, shall reduce VOC emissions using best available control technology.

The basketball backboard gluing operation is not subject to this rule because its VOC emission (0.24tons/yr) is well below 25 tons per year.

- (c) 326 IAC 6-3-2 (Process Operations)
The PM overspray from the basketball backboard gluing operation shall be limited using the following equation:

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

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

The emission from this operation is vented inside the building, and no emissions gets out into the atmosphere. The source therefore, is in compliance with this rule.

- (d) 326 IAC 2-4.1-1 (New Source Toxics Control)
This rule applies to any owner who construct or reconstruct a major source of hazardous air pollutants (HAP) as defined in 40 CFR 63.41, after July 27, 2997. This rule is not applicable to the basketball backboard gluing operation, because it is major for air toxics.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See calculations on page 3 of this Technical Support Document for detailed air toxic calculations.

Conclusion

The operation of this basketball backboard gluing facility shall be subject to the conditions of the attached proposed **Minor Part 70 Permit Modification 163-11792-00008**.