

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

Re: 163-11954-00008
2nd Exempted Preconstruction Approval and
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 February 29, 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 source modification consists of the installation of various insignificant activities that are exempted from preconstruction approval.

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: March 18, 1999
1 st Minor Permit Modification 163-11792-00008	Pages Affected: 6, 7 Pages Added: 7a
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date: February 25, 2000
2 nd Exempted Preconstruction Approval and Minor Permit Modification 163-11954-00008	Pages Affected: 6, 7
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date:

- (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) Fifteen (15) weld wire, one (1) robotic welder in basketball, with a total usage rate of 10,000 pounds of weld wire per year (lb/yr), that will exhaust to three (3) roof vents. One (1) weld wire, and one (1) robotic welder in Dept. 100, with a total usage rate of 1,500 lbs/yr. One (1) weld wire in the Machine Shop and one (1) in the Maintenance Shop.
- (6) Infrared cure equipment. (Basketball area)
- (7) The relocation of the exposure chambers for curing of UV inks and UV coatings from the UV Oven in pool mill room to the table tennis department, where heat is intended to discharge.
- (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 Exempted Preconstruction
Approval and 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.:	163-11954-00008
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 installation of the following new insignificant activities:
- (1) Fifteen (15) wire welders and one (1) robot welder to be located in the basketball area. These welders have a total usage rate of 10,000 pounds of weld wires per year, and will exhaust to three (3) roof vents;
 - (2) One (1) robotic welder in Dept. 100, with a total usage rate of 1,500 lbs/yr;
 - (3) One (1) wire welder in the Machine Shop and one (1) in the Maintenance Shop; and
 - (4) The relocation of the exposure chambers for curing of UV inks and UV coatings from the pool mill room to the table tennis department, where heat is intended to discharge.

The above installation of new insignificant activities will result in the revision of Section A.3, items (5) and (7) of the part 70 permit T163-7324-00008, issued on March 18, 1999 (changes are bolded and deletion are struck-through for emphasis):

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):

- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (a) **Fifteen (15) weld wires (4), one (1) robotic welder** in basketball, **with a**

total usage rate of 10,000 pounds of weld wire per year (lb/yr), that will exhaust to three (3) roof vents. One (1) weld wire, and one (1) robotic welder in Dept. 100, with a total usage rate of 1,500 lbs/yr. One (1) weld wire in the Machine Shop and one (1) in the Maintenance Shop.

- (6) Infrared cure equipment. (Basketball area).
- (7) **The relocation of the E exposure chambers for curing of UV inks and UV coatings from the UV Oven in pool mill room to the table tennis department, where heat is intended to discharge. (~~UV Oven in pool mill room~~)**

The page number 8 of 46 on the 1st Minor Permit Modification, issued on February 25, 2000, will be changed to 7a of 46, in this 2nd Minor Permit Modification.

The installation of the new insignificant activities will not result in any new applicable requirements.

History

On February 29, 2000, Indian Industries, Inc., dba Escalade Sports, submitted an application to the OAM requesting to install the above insignificant. 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 February 29, 2000.

Emission Calculations:

Facility	Throughput (lb _{weld wire} /yr)	Emission Factor (lbPM10/1000 lb wire)	PM10 Emissions (lb/hr)	PM10 Emissions (tons/yr)
Basketball Area: 15 hand-held welders & 1 robotic welder	10,000	5.2 (FIRE Version 5.0 SCC 30905254)	0.006	0.026
Dept 100 Area: 1 hand-held welder & 1 robotic welder	1,500	5.2 (FIRE Version 5.0 SCC 30905254)	0.001	0.004
TOTAL			0.007	0.03

Methodology:
 PM10 Emissions = throughput, lb/yr * Ef, lb/1000 lb * ton/2000 lb

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 new operations (insignificant activities) are "exempt from preconstruction approval" .

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.

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.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of these new hand-held wire and robotic welders shall be subject to the conditions of the attached proposed **Exempted Preconstruction Approval and Minor Part 70 Permit Modification 163-11954-00008**.