Dewayne Zint Indian Industries, Inc. d.b.a. Escalade Sports P.O. Box 889 Evansville, IN 47706-0889

Re: 163-12480-00008 Minor Permit Modification to Part 70 Permit 163-7324-00008

Dear Mr. Zint:

Indian Industries, Inc. was issued a Part 70 operation permit on March 18, 1999 for a sporting goods manufacturing plant located at 817 Maxwell Avenue, Evansville, IN 47711. An application requesting a revision was received on July 10, 2000. The request was made to add another undercoating machine to the plant. 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 and as follows:

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:

- (1) The following surface coating operations at the Table Tennis production line identified as unit #T1:
 - One (1) front spray booth identified as T0178 with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: T0178s);
 - (b) One (1) UV Fill machine, identified as T0150, with a maximum capacity of 180 wooden table tennis boards per hour, and exhausting through one (1) stack (S/V ID: T0150s);
 - (c) one (1) undercoater, identified as T0153, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausting through two (2) stacks (S/V ID: T0153As, T0153Bs), respectively;
 - (d) one (1) precision coater, identified as T0154, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausted through one (1) stack (S/V ID: T0154s);
 - (e) one (1) back striping machine, identified as T0356, with a maximum capacity of striping 38 wooden table tennis boards per hour, utilizing HVLP application, and exhausted inside the plant; and
 - (f) one (1) back spray booth, identified as T0362, with a maximum capacity of coating 72 wooden table tennis boards per hour, utilizing HVLP application with dry filters for overspray control and exhausted through one (1) stack (S/V ID: T0362s).

- (g) one (1) undercoater with an electric oven, identified as T0156, with a maximum capacity of coating 138 wooden table tennis boards per hour, utilizing roller application, and exhausting through one (1) stack (S/V ID: T0156s).
- (2) The following surface coating operations at the Archery Spray Booth production line identified as Unit# ASB:
 - (a) 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.

Furthermore, the facility description in Section D.1 is hereby amended as follows:

Facility Description [326 IAC 2-7-5(15)] - The following surface coating operations at the plant: (1) The following surface coating operations at the Table Tennis production line identified as unit #T1: One (1) front spray booth identified as T0178 with a maximum capacity of coating 180 (a) wooden table tennis boards per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: T0178s); One (1) UV Fill machine, identified as T0150, with a maximum capacity of 180 wooden (b) table tennis boards per hour, and exhausting through one (1) stack (S/V ID: T0150s); one (1) undercoater, identified as T0153, with a maximum capacity of coating 180 (C) wooden table tennis boards per hour, utilizing roller application, and exhausting through two (2) stacks (S/V ID: T0153As, T0153Bs), respectively; (d) one (1) precision coater, identified as T0154, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausted through one (1) stack (S/V ID: T0154s); (e) one (1) back striping machine, identified as T0356, with a maximum capacity of striping 38 wooden table tennis boards per hour, utilizing HVLP application, and exhausted inside the plant: and one (1) back spray booth, identified as T0362, with a maximum capacity of coating 72 (f) wooden table tennis boards per hour, utilizing HVLP application with dry filters for overspray control and exhausted through one (1) stack (S/V ID: T0362s). one (1) undercoater with an electric oven, identified as T0156, with a maximum (g) capacity of coating 138 wooden table tennis boards per hour, utilizing roller application, and exhausting through one (1) stack (S/V ID: T0156s). (2) The following surface coating operations at the Archery Spray Booth production line identified as Unit# ASB: one (1) surface coating booth, identified as AO311, with a maximum capacity of (a) 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).

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.

Indian Industries, Inc. Evansville, IN 47711 Permit Reviewer: Allen R. Davidson Page 4 of 4 163-12480-00008

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 Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Management

Attachments ARD

cc: File - Vanderburgh County U.S. EPA, Region V Vanderburgh County Health Department Evansville Environmental Protection Agency IDEM - Southwest Regional Office 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 and ENHANCED NEW SOURCE REVIEW 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 Administrative Amendment 163-10894-00008	Issuance Date: July 28, 1999
1 st Minor Permit Modification 163-11792-00008	Issuance Date: February 25, 2000
2 nd Minor Permit Modification 163-11954-00008	Issuance Date: May 8, 2000
3 rd Minor Permit Modification 163-12480-00008	Pages Amended: 6, 33
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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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 Management (OAM) and the Evansville Environmental Protection Agency. 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 stationary sporting and athletic goods production source.

Responsible Official:	Dave Smith - VP Operations
Source Address:	817 Maxwell Ave., Evansville, Indiana 47711
Mailing Address:	P.O. Box 889, Evansville, Indiana 47706-0889
SIC Code:	3949
County Location:	Vanderburgh
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

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:

- (1) The following surface coating operations at the Table Tennis production line identified as unit #T1:
 - (a) One (1) front spray booth identified as T0178 with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: T0178s);
 - (b) One (1) UV Fill machine, identified as T0150, with a maximum capacity of 180 wooden table tennis boards per hour, and exhausting through one (1) stack (S/V ID: T0150s);
 - (c) one (1) undercoater, identified as T0153, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausting through two (2) stacks (S/V ID: T0153As, T0153Bs), respectively;
 - (d) one (1) precision coater, identified as T0154, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausted through one (1) stack (S/V ID: T0154s);
 - (e) one (1) back striping machine, identified as T0356, with a maximum capacity of striping 38 wooden table tennis boards per hour, utilizing HVLP application, and exhausted inside the plant;
 - (f) one (1) back spray booth, identified as T0362, with a maximum capacity of coating 72 wooden table tennis boards per hour, utilizing HVLP application with dry filters for overspray control and exhausted through one (1) stack (S/V ID: T0362s).

- (g) one (1) undercoater with an electric oven, identified as T0156, with a maximum capacity of coating 138 wooden table tennis boards per hour, utilizing roller application, and exhausting through one (1) stack (S/V ID: T0156s).
- (2) The following surface coating operations at the Archery Spray Booth production line identified as Unit# ASB:
 - (a) 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).

SECTION B

GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
 - (a) 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 Part 70 permit under 326 IAC 2-7.
 - (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."
- B.2 Definitions [326 IAC 2-7-1]

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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

- B.3
 Permit Term [326 IAC 2-7-5(2)]

 This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.
- B.4 Enforceability [326 IAC 2-7-7(a)]
 - (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and the Evansville Environmental Protection Agency.
 - (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
 - (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the Evansville Environmental Protection Agency
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
 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 2-7-3 and 326 IAC 2-7-4(a).
- B.6
 Severability [326 IAC 2-7-5(5)]

 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.7Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]This permit does not convey any property rights of any sort, or any exclusive privilege.
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
 - (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Blvd Evansville, Indiana 47708

- (b) The Permittee shall furnish to IDEM, OAM, and the Evansville Environmental Protection Agency within a reasonable time, any information that IDEM, OAM, and the Evansville Environmental Protection Agency 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and the Evansville Environmental Protection Agency copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and the Evansville Environmental Protection Agency along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
 - (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
 - (b) 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.
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
 - (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
 - (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
 - (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(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 certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year 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

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Blvd Evansville, Indiana 47708

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (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, OAM, and the Evansville Environmental Protection Agency on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and the Evansville Environmental Protection Agency may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]
 - (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

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- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and the Evansville Environmental Protection Agency upon request and shall be subject to review and approval by IDEM, OAM, and the Evansville Environmental Protection Agency.
- B.13 Emergency Provisions [326 IAC 2-7-16]
 - (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 2-7-16.
 - (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, OAM, and the Evansville Environmental Protection Agency 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 Management, Compliance Section), or Telephone Number: 317-233-5674 (ask for Compliance Section) Facsimile Number: 317-233-5967 Evansville EPA Telephone Number: 812-426-5597 Evansville EPA Facsimile Number: 812-426-5651

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

and

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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 2-7-5(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAM, and the Evansville Environmental Protection Agency may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, and the Evansville Environmental Protection Agency by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and the Evansville Environmental Protection Agency shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and the Evansville Environmental Protection Agency has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and the Evansville Environmental Protection Agency has issued the modification. [326 IAC 2-7-12(b)(8)]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
 - (a) Deviations from any permit requirements (for emergencies see Section B Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

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within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or

- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
 - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)]
 - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and the Evansville Environmental Protection Agency 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 2-7-9(a)(3)]
 - (c) Proceedings by IDEM, OAM, and the Evansville Environmental Protection Agency 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 2-7-9(b)]
 - (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and the Evansville Environmental Protection Agency at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and the Evansville Environmental Protection Agency may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]
- B.18 Permit Renewal [326 IAC 2-7-4]
 - (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and the Evansville Environmental Protection Agency and shall include the information specified in 326 IAC 2-7-4. 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(40).

Request for renewal shall be submitted to:

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

and

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- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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, and the Evansville Environmental Protection Agency on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, and the Evansville Environmental Protection Agency, upon receiving a timely and complete 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] 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 2-7 until IDEM, OAM, and the Evansville Environmental Protection Agency, 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 in writing by IDEM, OAM, and the Evansville Environmental Protection Agency, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAM, and the Evansville Environmental Protection Agency fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
 - (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

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Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]
 - (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
 - (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)] The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:
 - (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
 - (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- B.22 Operational Flexibility [326 IAC 2-7-20]
 - (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 2-1 and MCE 3.30.18 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

Third Minor Permit Modification 163-12480-00008 Amended by: Allen R. Davidson

(4) The Permittee notifies the:

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

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Blvd Evansville, Indiana 47708

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and the Evansville Environmental Protection Agency in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)] The Permittee may trade increases and decreases in emissions in 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)] 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 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) 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.23 Construction Permit Requirement [326 IAC 2] Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2 and MCE 3.30.18.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, and the Evansville Environmental Protection Agency U.S. EPA, or an authorized representative to perform the following:

- Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and the Evansville Environmental Protection Agency or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and the Evansville Environmental Protection Agency nor an authorized representative, may disclose the information unless and until IDEM, OAM, and the Evansville Environmental Protection Agency makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, and the Evansville Environmental Protection Agency acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11] Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and the Evansville Environmental Protection Agency, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, and the Evansville Environmental Protection Agency shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and the Evansville Environmental Protection Agency, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

Indian Industries, Inc. Evansville, Indiana Permit Reviewer: JM/EVP

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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%) opacity 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.3 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, 326 IAC 4-1-6 or MCE 3.30.18.214. 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2] The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- <u>C.5</u> 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) or MCE 3.30.18.212. 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)] All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7. Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
 - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
 - (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
 - (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Blvd Evansville, Indiana 47708

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

- C.8 Performance Testing [326 IAC 3-6]
 - (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in 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

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Blvd Evansville, Indiana 47708

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

- C.9 Compliance Schedule [326 IAC 2-7-6(3)] The Permittee:
 - (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Blvd Evansville, Indiana 47708

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):
 - (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
 - (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015 Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Blvd Evansville, Indiana 47708 within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, and the Evansville Environmental Protection Agency, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, and the Evansville Environmental Protection Agency that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215] If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:
 - (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, and the Evansville Environmental Protection Agency that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
 - (b) Provide annual certification to IDEM, OAM, and the Evansville Environmental Protection Agency that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- C.15 Compliance Monitoring Plan Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]
 - (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and the Evansville Environmental Protection Agency upon request and shall be subject to review and approval by IDEM, OAM, and the Evansville Environmental Protection Agency. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
 - (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
 - (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]
 - (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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
 - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
 - (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Blvd Evansville, Indiana 47708 within ninety (90) days after the date of issuance of this permit.

- (c) The annual emission statement 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, and the Evansville Environmental Protection Agency on or before the date it is due.
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
 - (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
 - (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
 - (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
 - (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
 - (e) At its discretion, IDEM and the Evansville Environmental Protection Agency may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
 - (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 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, and the Evansville Environmental Protection Agency representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the Evansville Environmental Protection Agency makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the Evansville Environmental Protection Agency 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.20 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.
- (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

and

Evansville Environmental Protection Agency Room 250 101 N.W. Martin Luther King Jr. Blvd Evansville, Indiana 47708 within ninety (90) days after the date of issuance of this permit.

- (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, and the Evansville Environmental Protection Agency 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.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

- C.21 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.
FACILITY OPERATION CONDITIONS

Facility	Facility Description [326 IAC 2-7-5(15)] - The following surface coating operations at the plant:										
(1)	The following surface coating operations at the Table Tennis production line identified as un #T1:										
	(a)	One (1) front spray booth identified as T0178 with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: T0178s);									
	(b)	One (1) UV Fill machine, identified as T0150, with a maximum capacity of 180 wooden table tennis boards per hour, and exhausting through one (1) stack (S/V ID: T0150s);									
	(C)	one (1) undercoater, identified as T0153, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausting through two (2) stacks (S/V ID: T0153As, T0153Bs), respectively;									
	(d)	one (1) precision coater, identified as T0154, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausted through one (1) stack (S/V ID: T0154s);									
	(e)	one (1) back striping machine, identified as T0356, with a maximum capacity of striping 38 wooden table tennis boards per hour, utilizing HVLP application, and exhausted inside the plant;									
	(f)	one (1) back spray booth, identified as T0362, with a maximum capacity of coating 72 wooden table tennis boards per hour, utilizing HVLP application with dry filters for overspray control and exhausted through one (1) stack (S/V ID: T0362s).									
	(g)	one (1) undercoater with an electric oven, identified as T0156, with a maximum capacity of coating 138 wooden table tennis boards per hour, utilizing roller application, and exhausting through one (1) stack (S/V ID: T0156s).									
(2)		lowing surface coating operations at the Archery Spray Booth production line identified # ASB:									
	(a)	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).									

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the table tennis surface coating booths identified as T0154, T0356, and T0362 shall utilize one of the following application methods:

Airless Spray Application Air Assisted Airless Spray Application Electrostatic Spray Application Electrostatic Bell or Disc Application Heated Airless Spray Application Roller Coating Brush or Wipe Application Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

Any change or modification which may increase source-wide VOC emissions from the surface coating equipment listed in this section, as well as from the equipment listed in Sections D.3 and D.4 of this operating permit to greater than 250 tons per twelve (12) consecutive month period shall require prior approval from the OAM. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

- D.1.3
 Particulate Matter (PM) [326 IAC 6-1-2(a)]

 The PM emissions from the surface coating booths identified as T0178, T0362, T0356, AO326, and AO311 shall not exceed 0.03 grains per dry standard cubic foot.
- D.1.4 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 T0178, T0362, AO326, and AO311, and their corresponding dry filter control devices

Compliance Determination Requirements

D.1.5 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 at any specific time 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.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, and the Evansville Environmental Protection Agency reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Conditions D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

- D.1.8 Particulate Matter (PM)
 - The dry filters for PM control shall be in operation at all times when the surface coating booths identified as T0178, T0362, AO326, AO311 are in operation.
- D.1.9 Monitoring
 - (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily monometer pressure checks shall be performed on the surface coating booths (T0178, T0362, AO326, AO311) while one or more of the booths are in operation. The pressure drop across each booth shall be maintained within the range specified within the Compliance Response Plan. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Monthly inspections shall be performed for the presence of overspray from the surface coating booth stacks (T0178, T0362, AO326, AO311) on the nearby ground and annual inspections shall be performed for the presence of overspray on the rooftop. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

- D.1.10 Record Keeping Requirements
 - (a) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily monometer pressure drop readings, monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

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FACILITY OPERATION CONDITIONS

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

- (1) 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).

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

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, and Evansville EPA Operating Permit #R-008-002-001, issued on February 1, 1995, particulate matter (PM) emissions from the archery machining centers, and pool area machining centers controlled by the dust collector (O329) shall not exceed 0.03 grains per dry standard cubic foot. This is equivalent to a PM emission rate of 5.4 pounds per hour.

- D.2.2
 Particulate Matter (PM) [326 IAC 6-1-2(a)]

 Particulate matter (PM) emissions from the basketball area powermatic CNC router, and pool mill shoda router controlled by the dust collectors 0330 and 0429, respectively, shall not exceed 0.03 grains per dry standard cubic foot.
- D.2.3
 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 each machining operation and baghouse listed in this section.

Compliance Determination Requirements

D.2.4 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 at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

The baghouse(s) O329, O330, and O429 for PM control shall be in operation at all times when their respective archery machining centers and pool area machining centers, basketball area powermatic CNC router, and pool mill shoda router are in operation and exhausting to the outside atmosphere.

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

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse(s) (O329, O330, and O429) 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.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the each baghouse (O329, O330, and O429) used in conjunction with the archery machining centers and pool area machining centers, basketball area powermatic CNC router, and pool mill shoda router, at least once weekly when the woodworking and plastics machining processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range specified below or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

Baghouse	Pressure Drop
O329	0.8 - 5.0 inches of water
O330	1.0 - 5.0 inches of water
O429	0.8 - 2.0 inches of water
	the preserves shall expended with Costien C

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and the Evansville Environmental Protection Agency and shall be calibrated at least once every six (6) months.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. 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 single compartment baghouses, 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.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse(s) (O329, O330,and O429) stack exhaust.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure;
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (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.

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following fiberglass manufacturing operations:

- (1) 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;
- (2) 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.

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

D.3.1 Volatile Organic Compounds [326 IAC 8-1-6]

The VOC usage at the fiberglass basketball backboard closed sheet molding operation identified as Unit# B-1, including dilution solvents, cleaning solvents, and Styrene monomer (based on a 2.0% flash-off of styrene usage pursuant to U.S. EPA emission factor from AP-42, Fifth Edition, Table 4.4-2), shall be such that VOC emissions do not exceed 25 tons per twelve (12) consecutive month period. Any change or modification which increases the potential to emit VOC to greater than or equal to 25 tons per year shall comply with the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6.

Compliance Determination Requirements

D.3.2 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 at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following specifically regulated insignificant activities:

(a) Degreasing operations that do not exceed 145 gallons (not to include waste solvent shipped off site) per 12 months, except if subject to 326 IAC 20-6 (Three (3) Safety-Kleen parts cleaner-wash tanks).

(b) one (1) B0632 BB area 0.51 mmBtu/hr twin chamber, twin burner bake off oven;

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

- D.4.1 Volatile Organic Compounds (VOC) The three (3) Safety-Kleen cold cleaner degreasers (parts washers) shall comply with the following operating and control requirements:
 - (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.4.2 Particulate Matter (PM) [326 IAC 4-2]

Pursuant to Evansville EPA Operating Permit #R-008-002-001, issued on February 1, 1995, the one (1) B0632 BB area 0.51 mmBtu/hr twin chamber, twin burner bake off oven used to bake off cured paint residue from bake oven racks shall not emit PM in excess of 0.5 pounds per one thousand (1000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

Compliance Determination Requirements

D.4.3 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 at any specific time 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.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

and the

Evansville Environmental Protection Agency

PART 70 OPERATING PERMIT CERTIFICATION

Source Name:Indian Industries, Inc., dba Escalade SportsSource Address:817 Maxwell Ave., Evansville, Indiana 47711Mailing Address:P.O. Box 889, Evansville Indiana 47706-0889Part 70 Permit No.:T163-7324-00008

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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify)
- 9 Report (specify)
- 9 Notification (specify)
- 9 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:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION P.O. Box 6015 100 North Senate Avenue Indianapolis, Indiana 46206-6015 Phone: 317-233-5674 Fax: 317-233-5967

and the Evansville Environmental Protection Agency

PART 70 OPERATING PERMIT EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name:	Indian Industries, Inc., dba Escalade Sports
Source Address:	817 Maxwell Ave., Evansville, Indiana 47711
Mailing Address:	P.O. Box 889, Evansville Indiana 47706-0889
Part 70 Permit No.:	T163-7324-00008

This form consists of 2 pages

Check either No. 1 or No.2

Page 1 of 2

9	1.	 This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:

Describe the cause of the Emergency/Deviation:

Third Minor Permit Modification 163-12480-00008 Amended by: Allen R. Davidson

If any of the following are not applicable, mark N/A	Page 2 of 2
Date/Time Emergency/Deviation started:	
Date/Time Emergency/Deviation was corrected:	
Was the facility being properly operated at the time of the emergency/deviation? Describe:	Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:	
Estimated amount of pollutant(s) emitted during emergency/deviation:	
Describe the steps taken to mitigate the problem:	
Describe the corrective actions/response steps taken:	
Describe the measures taken to minimize emissions:	
If applicable, describe the reasons why continued operation of the facilities are neo imminent injury to persons, severe damage to equipment, substantial loss of capita loss of product or raw materials of substantial economic value:	

Form Completed by: Title / Position: Date: Phone:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION and the

Evansville Environmental Protection Agency

PART 70 OPERATING PERMIT QUARTERLY COMPLIANCE MONITORING REPORT

Source Name:	Indian Industries, Inc., dba Escalade Sports
Source Address:	817 Maxwell Ave., Evansville, Indiana 47711
Mailing Address:	P.O. Box 889, Evansville Indiana 47706-0889
Part 70 Permit No.:	T163-7324-00008

Months: ______ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By:	
Title/Position:	
Date:	
Phone:	

Attach a signed certification to complete this report.

Appendix A: Emissions Calculations VOC and Particulate From Surface Coating Operations

Company Name: Indian Industries, Inc. Address City IN Zip: 817 Maxwell Avenue, Evansville, IN 47706 CP: 163-12480 Plt ID: 163-00008 Reviewer: Allen R. Davidson Date: 08/01/00

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)		Weight % Organics		Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
9490-W	9.17	58.21%	45.1%	13.1%	50.6%	41.79%	0.01200	137.500	2.44	1.20	1.99	47.68	8.70	0.00	2.88	100%
9537-W	9.22	58.27%	46.9%	11.4%	46.9%	52.22%	0.01200	137.500	1.98	1.05	1.73	41.62	7.60	0.00	2.01	100%
	0.00	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
	0.00	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
	0.00	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
	0.00	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
	0.00	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
	0.00	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
	0.00	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%
	0.00	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	ERR	0%

State Potential Emissions

Add worst case coating to all solvents

1.99 47.68 8.70 0.00

METHODOLOGY

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

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

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

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations HAP Emission Calculations

Company Name: Indian Industries, Inc. Address City IN Zip: 817 Maxwell Avenue, Evansville, IN 47706 CP #: 163-12480 Plt ID: 163-00008 Permit Reviewer: Allen R. Davidson Date: 08/01/00

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)		Weight % Toluene	Weight % Formaldehyde		Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
9490-W	9.17	0.01200	137.500	0.00%	0.00%	0.00%	0.00%	0.00%	10.22%	0.00%	0.00	0.00	0.00	0.00	0.00	6.77	0.00
9537-W	9.22	0.01200	137.500	0.00%	0.00%	0.00%	0.00%	0.00%	9.72%	0.00%	0.00	0.00	0.00	0.00	0.00	6.48	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total State Po	Total State Potential Emissions										0.00	0.00	0.00	0.00	0.00	6.77	0.00

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

hapcalc.wb3