Mr. Mark Bailey
Ward Pattern & Engineering, Inc.
7603 Opportunity Drive
Ft. Wayne, IN 46825

Re: 003-12515
First Significant Permit Revision to
FESOP 003-8477-00263

Dear Mark Bailey:

Ward Pattern & Engineering, Inc. was issued a FESOP permit on August 11, 1997 for the operation of an aluminum heat-treating facility. A letter requesting changes to this permit was received on July 24, 2000. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of one (1) wheelabrator tumbleblast shot blaster with a maximum steel shot blast rate of 129,000 lbs/ hr, that's equipped with a baghouse for control of particulate emissions. The new baghouse will replace the two existing baghouses so that all three shot blasts will be controlled by the same baghouse. The new baghouse has a higher control efficiency than the existing baghouses. Therefore, emissions from the existing shot blasts will decrease.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction, which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. The entire revised permit is provided.

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 Sherry Harris, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Sherry Harris or extension (4-1207), or dial (317) 234-1207.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
sah
cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector – Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Ward Pattern & Engineering, Inc. Heat Treat Plant
7603 Opportunity Drive
Fort Wayne, Indiana 46825

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments)
and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F003-8477-00263	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: August 11, 1997

First Significant Permit Revision.: F003-12515-00263 Pages Affected: 3,4, 21, 22, 23	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

A.1 General Information

The Permittee owns and operates an aluminum castings heat treat plant.

Responsible Official:	Chris L. Ward
Source Address:	7603 Opportunity Drive, Fort Wayne, Indiana 46825
Mailing Address:	642 Growth Avenue, Fort Wayne, Indiana 46808
SIC Code:	3365
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary

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

(a) one (1) natural gas fired solution furnace (ID No. 1) rated at 12.75 million (MM) Btu/hr (includes a new 4.5 MMBtu/hr addition to increase the capacity from 8.25 MMBtu/hr), exhausting through two (2) stacks, identified as Stack Nos. 5 and 31;

(b) one (1) Goff Spin Blast shot blaster, identified as SB1, with a maximum steel shot blast rate of 26,640 pounds per hour, equipped with a common baghouse (BH-1) for control of particulate emissions, and exhausting through one (1) stack, identified as Stack No. 2; and

(c) one (1) Wheelabrator Tumbleblast shot blaster, identified as SB2, with a maximum steel shot blast rate of 51,600 pounds per hour, equipped with a common baghouse (BH-1) for control of particulate emissions, and exhausting through one (1) stack, identified as Stack No. 2.

(d) one (1) Wheelabrator Tumbleblast shot blaster (SB3) with a maximum steel shot blast rate of 129,000 pounds per hour, equipped with a new baghouse (BH-1) for control of particulate emissions, exhausting through Stack No. 2. The new baghouse (BH-1) will replace the existing baghouses (BH-1) and (BH-2) so that all three shot blasts will be controlled by the same baghouse. The new baghouse has a higher control efficiency than the existing baghouse. Therefore, emissions from SB1 and SB2 will decrease.

A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(a) one (1) natural gas fired solution furnace (ID No. 2) rated at 4.5 MMBtu/hr;
(b) two (2) natural gas fired quench tank heaters (ID Nos. 1 and 3), each rated at 1.5 MMBtu/hr;
(c) six (6) natural gas fired age ovens (ID Nos. 1 through 6), each rated at 0.5 MMBtu/hr;
(d) four (4) natural gas fired age ovens (ID Nos. 7 through 10), each rated at 1.0 MMBtu/hr;
(e) one (1) natural gas fired space heater rated at 1.0 MMBtu/hr;
(f) one (1) natural gas fired office heater rated at 0.125 MMBtu/hr;
(g) one (1) natural gas fired water heater rated at 0.04 MMBtu/hr;
(h) waste sand and recycled sand handling operations processing a maximum total of 1.1 tons of sand per hour;
(i) quenching operations used with heat treating processes;
(j) paved and unpaved roads and parking lots with public access; and
(k) blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

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

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the conditions of all construction and operating permits issued under 326 IAC 2 prior to the effective date of this permit.

SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)
The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

B.2 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the meaning 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 (prior to July 1, 1996, IC 13-7-2, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(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 13-5-5-3 (prior to July 1, 1996, IC 13-7-10-2.5), of the permit.

B.4 Enforceability [326 IAC 2-8-6]
(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(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.

B.5 Termination of Right to Operate [326 IAC 2-8-9]
The expiration of this permit terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.

B.6 Severability [326 IAC 2-8-4(4)]
(a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(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

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM 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 written request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(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.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]
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.

A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, and work practices. The certification shall be submitted July 1 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

(b) This annual compliance certification report required by this permit shall be timely if:

(1) Delivered by U.S. mail and postmarked on or before the date it is due; or

(2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term and condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period.

B.13 Preventive Maintenance Plan [326 IAC 2-8-5(a)(1)] [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

(a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans as necessary including the following information on each:

(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) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;

(4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and

(5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

(b) Preventive Maintenance Plans shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provision [326 IAC 2-8-12]

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

(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 describes 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 of this permit;

(4) For each emergency lasting longer than one (1) hour, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency occurrence by telephone or facsimile;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

(5) For each emergency lasting longer than one (1) hour, the Permittee submitted written notice 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

within two (2) working days of the time when emission limitations were exceeded due to the emergency. The notice shall fulfill the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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(C)(33).

(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 any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

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

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

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

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

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

Any operations shall continue no longer than the minimum time required to prevent the situations identified in clause (B) above.

B.15 Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]
Deviations from requirements, (for emergencies see Section B - Emergency Provision) the probable cause of such deviations, and any corrective actions 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

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

Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms or their substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8(a)] [326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if the Commissioner determines any of the following:

(1) That it contains a material mistake.

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

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

(c) Proceedings by IDEM, OAM, 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 practical. [326 IAC 2-8-8(b)]

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

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

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, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) The Permittee has a duty to submit a timely and complete permit renewal application. 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) Delivered by U.S. mail and postmarked on or before the date it is due; or

(C) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM 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, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

(a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).

(b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).

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

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.

(b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).

(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).

(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.

(b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

(c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.

(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]
Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable FESOP's, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable implementation plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d), without 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) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions);

(3) 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

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

(4) 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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review. Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).

(b) For each such 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(C)(33).

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable State Implementation Plan (SIP) provides for such emission trades without requiring a permit revision, subject to the constraints in Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7) and subject to the constraints in Section (a) of this condition and those in 326 IAC 2-8-15(d).

B.23 Construction Permit Requirement [326 IAC 2-1]
Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-8-5(a)(2)]
Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records are 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;

(c) 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 demonstrating compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.

(b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.

(c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.

(d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0178 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]
Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed ninety-nine (99) tons per three hundred sixty five (365) day period. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed nine (9) tons per three hundred sixty five (365) day period of any individual HAP or twenty-four (24) tons per three hundred sixty five (365) day period of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

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

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (60 readings) in a six (6) hour period.

C.3 Open Burning
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

C.4 Fugitive Dust Emissions
The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1]
Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including category I and Category II nonfriable asbestos-containing material.

C.6 Stratospheric Ozone Depleting Substance Regulations [326 IAC 22-1] [40 CFR 82]
The Permittee shall comply with the provisions of 40 CFR 82 on the protection of stratospheric ozone.

C.7 Operation of Equipment [326 IAC 2-85(a)(4)]
(a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained according to the Preventive Maintenance Plan.

(b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.

(c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

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

C.8 Performance Testing

Compliance testing shall be conducted on the two (2) shot blasters for PM and PM-10 within forty eight (48) months after issuance of this FESOP. The Permittee shall perform the tests specified in this permit to demonstrate compliance with the applicable rule or permit condition. All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures) and by methods in the approved test protocol. The test protocol 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

at least thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any additional monitoring 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 shall notify:

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

in writing, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

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(C)(33).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(a)(iii)]

The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times. In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors

and related equipment. Preventive Maintenance Plans of the monitors shall be implemented. In addition prompt correction, as indicated, shall be initiated within the time frames specified, whenever the parameters monitored fall outside of the indicated values.

C.11 Monitoring Methods [326 IAC 3]
Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.12 Pressure Gauge Specifications
Whenever a condition in this permit requires the taking 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 (±2%) of full scale reading.

C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

(a) Notification Requirements

(1) The Permittee shall provide IDEM, OAM and U.S. EPA a written notice of intention to demolish or renovate and update such notice as necessary, including, but not limited to, the following:

(A) when the amount of affected asbestos-containing material increases or decreases by at least twenty percent (20%); or

(B) if there is a change in the following:

(i) asbestos removal or demolition start date;

(ii) removal or demolition contractor; or

(C) waste disposal site.

(2) The Permittee shall postmark or deliver the notice according to the guidelines set forth in 326 IAC 14-10-3(2) and 40 CFR 61.145(b)(3).

(3) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3) and 40 CFR 61.145(b)(4).

All required information 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 46204-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) 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).

Corrective Actions [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]

C.14 Failure to Take Corrective Action

For each unit for which parametric monitoring is required, appropriate corrective actions as described in the Preventive Maintenance Plan shall be taken when indicated by monitoring information. Failure to take corrective action following an excursion of a surrogate monitoring parameter within the indicated time will constitute a violation of the permit unless taking the corrective action set forth in the Plan would be unreasonable.

After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:

(a) Providing that prompt action was taken to correct the monitoring equipment, that the monitoring equipment malfunctioned, giving a false reading; or

(b) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate and either:

(1) the Permittee has submitted a request for a permit revision, and the request has not been denied; or

(2) the Permittee submits a request for a permit revision promptly after determining that the parameters are technically inappropriate.

(c) An automatic measurement was taken when the process was not operating; or

(d) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.

Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

Whenever the results of the stack test performed in conformance with Section C.8 - Performance Testing, of this permit exceed the level specified in any condition of this permit, appropriate corrective actions shall be submitted to IDEM, OAM within thirty (30) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAM that they are not acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

A second test to demonstrate compliance shall be performed within one hundred twenty (120) days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.16 Monitoring Data Availability

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. Records shall be kept of the times that the equipment is not operating. 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. 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. At its discretion, IDEM 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. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.17 General Record Keeping Requirements

(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 and available within one hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include:

(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:

(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) All preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it;

(5) Relevant work purchases orders;

(6) Quality assurance and quality control procedures;

(7) Operator’s standard operating procedures;

(8) Manufacturer's specifications or their equivalent; and

(9) Equipment "troubleshooting" guidance.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements

(a) 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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if:

(1) Delivered by U.S. mail and postmarked on or before the date it is due; or

(2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.

(c) Unless otherwise specified in this permit any semi-annual report shall be submitted within thirty (30) days of the end of the six (6) month reporting period.

(d) All instances of deviations from any requirements of this permit must be clearly identified in such reports;

(e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

(f) The first report shall cover the period commencing the date of issuance of this permit and ending the last day of the quarter in which the permit is issued.

SECTION D.1 FACILITY OPERATION CONDITIONS

(b) one (1) Goff Spin Blast shot blaster, identified as SB1, with a maximum steel shot blast rate of 26,640 pounds per hour, equipped with a common baghouse (BH-1) for control of particulate emissions, and exhausting through one (1) stack, identified as Stack No. 2,

(c) one (1) Wheelabrator Tumbleblast shot blaster, identified as SB2, with a maximum steel shot blast rate of 51,600 pounds per hour, equipped with a common baghouse (BH-1) for control of particulate emissions, and exhausting through one (1) stack, identified as Stack No. 2, and

(d) one (1) Wheelabrator Tumbleblast shot blaster (SB3) with a maximum steel shot blast rate of 129, 000 pounds per hour, equipped with a new baghouse (BH-1) for control of particulate emissions, exhausting through Stack No. 2. The new baghouse (BH-1) will replace the existing baghouses (BH-1) and (BH-2) so that all three shot blasts will be controlled by the same baghouse. The new baghouse has a higher control efficiency than the existing baghouse. Therefore, emissions from SB1 and SB2 will decrease.

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 6-3-2] [326 IAC 2-2]

D.1.1 Particulate Matter

Pursuant to 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate matter emissions from the Goff shot blaster (SB1)and Wheelabrator shot blasters (SB2) and (SB3) shall not exceed 23.24, 36.19 and 46.98 pounds per hour, respectively.

The total PM emissions for the source shall be less than 250 tons/yr.

D.1.2 Particulate Matter 10 Microns (PM-10)

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the Goff shot blaster (SB1) and Wheelabrator shot blasters (SB2) and (SB3) shall not exceed 0.092, 0.177 and 0.443 pounds per hour, respectively, including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

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

D.1.3 Particulate Matter

During the period between 36 and 48 months after issuance of this permit, the Permittee shall perform PM and PM-10 testing utilizing methods per 40 CFR Part 60 Appendix A, Method 5, 17, 40 CFR Part 51 Appendix M, Method 201, 201a, 202, as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10.

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

D.1.4 Daily Visible Emission Notations

Daily visible emission notations of the baghouse stack controlling emissions from the three shot blasters shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is

observed.

D.1.5 Pressure Readings

The Permittee shall take readings of the total static pressure drop across the one (1) common baghouse controlling the three (3) shot blasters at least once a day when the shot blasting system is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse (BH-1) controlling the three shot blasters shall be maintained within the range of 2 and 8 inches of water, or ranges established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure readings are outside of the above mentioned ranges for any one reading.

The instrument used for determining the pressure shall comply with Condition C.12 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.6 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for each of the three (3) shot blasters.

D.1.7 Preventive Inspections

The following inspections shall be performed when the three (3) shot blasters are operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:

For the Goff shot blaster (SB1):

Twice weekly:

(a) Inspect for damage
(b) Inspect blower
(c) Inspect refuse for useable shot
(d) Inspect manometer
(e) Inspect air lines
(f) Inspect pulsaters
(g) Inspect and grease bearings
(h) Inspect motor and wire
(i) Empty hopper
(j) Check duct work for build-up and wear
(k) Rotation of blower
(l) Check belts & pulleys for tightness and wear

Monthly:

(a) Check fan housing for dirt build-up
(b) Manual check air pulse for bags
(c) Shut down system & check bags for build-up and tears
(d) Check for build-up on walls

Quarterly:

(a) Take air pulsers apart and clean
(b) Open duct work & check for build-up in piping

(c) Clean bags with air nozzle

Yearly:

(a) Change bags

For the Wheelabrator shot blasters (SB2) and (SB3):

Daily:

(a) Run shaker
(b) Empty hopper
(c) Inspect for useable shot

Twice weekly:

(a) Inspect for damage
(b) Inspect blower
(c) Inspect manometer
(d) Inspect air lines
(e) Inspect and grease bearings
(f) Inspect motor and wiring
(g) Check duct work for build-up and wear
(h) Rotation of blower
(i) Check belts & pulleys for tightness and wear

Monthly:

(a) Check fan housing for dirt build-up
(b) Manual check shaker system
(c) Shut down system & check bags for build-up and tears
(d) Check for build-up on walls

Quarterly:

(a) Open duct work & check for build-up in piping
(b) Clean bags with air nozzle

Yearly:

(a) Change bags

D.1.8 Broken Bag or Failure Detection
That in the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the units have been replaced.

(b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.1.9 Operational Parameters
The Permittee shall maintain a daily record for one (1) common baghouse (BH-1) controlling particulate matter emissions from the three (3) shot blasters of the following values:

(a) Inlet and outlet differential static pressure;

(b) Pulsing frequency and duration, air pressure of pulse, differential static pressure during pulsing, and that the hopper was emptied at the end of the day for the Goff shot blaster baghouse;

(c) Differential static pressure before and after shaking, that the shaker was run and the hopper was emptied at the end of the day for the Wheelabrator shot blaster baghouse; and

(d) Visible observations.

State Form 47738 (5-96)

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Ward Pattern & Engineering, Inc. Heat Treat Plant
Source Address: 7603 Opportunity Drive, Fort Wayne, Indiana 46825
FESOP No.: F003-8477-00263

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 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)

9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT

(For Control Equipment Monitoring Only)

Source Name: Ward Pattern & Engineering, Inc. Heat Treat Plant
Source Address: 7603 Opportunity Drive, Fort Wayne, Indiana 46825
FESOP No.: F003-8477-00263

A separate copy of this report must be submitted for **each** monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.
Stack/Vent ID:
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)
9 Continuously **9** Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400^{0}F, 2-4 psi pressure drop)
Report Covers From: To: (date: month/day/yr)
9 No Deviations from the Parameter Restriction/Range Occurred During the Monitoring Period. Complete Records Maintained at the Facility Verify Compliance with this Condition.
9 Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ([2]/[1]x100)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT

Source Name: Ward Pattern & Engineering, Inc. Heat Treat Plant
Source Address: 7603 Opportunity Drive, Fort Wayne, Indiana 46825
FESOP No.: F003-8477-00263

A separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Name:	Ward Pattern & Engineering, Inc.
Source Location:	7603 Opportunity Dr., Ft. Wayne, IN 46825
County:	Allen
Significant Permit Revision:	CP-003-12515-00263
SIC Code:	3361
Permit Reviewer:	Sherry Harris

On October 27, 2000 the Office of Air Management (OAM) had a notice published in the Journal Gazette, Fort Wayne, Indiana, stating that Ward Pattern & Engineering, Inc. had applied for a Part 70 Significant Permit Revision to construct and operate an Aluminum Heat Treat Plant with control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 1, 2000, Ward Pattern & Engineering, Inc. submitted comments on the proposed Significant Permit Revision. The summary of the comments and corresponding responses is as follows:

Comment 1:
Page 1, Line 3, Paragraph 1, of Mr. Dubenetzky's letter to Mr. Bailey: Reference is made to the receipt of a letter on August 12, 1996, requesting changes to the existing permit. In the TSD, pg. 1, under History, it states that an application was submitted for approval of a construction permit on August 12, 1996. This date may refer to the original application for a FESOP, but it does not refer to this application. I believe the correct date in that space should be July 17, 2000, the date of the signing of the application, or July 24, 2000, representing the date received by your office.

Response to comment 1:
This change was made as requested**.**

Comment 2:
Section C.8: It was clear to me, when the shot blasters were connected to their own baghouses, that emissions testing would be done on the individual baghouse stacks since the shot blast units have no "stack" except through the baghouse. With all three shot bast units connected to one baghouse, how are we to check stack emissions from the individual units, and how are the summed emissions divided between the units, if they are supposed to be? Also, "testing is to be done within 36-48 months of the issued FESOP." Please change the period to "within 48 months after issuance."

Response to Comment 2:
Condition C.8 has been modified as follows:

Compliance testing shall be conducted on the two (2) shot blasters for PM and PM-10 within ~~thirty-six (36) to~~ forty-eight (48) months ~~of issuing~~ **after issuance of** this FESOP. The Permitee shall perform t e test specified in this permit to demonstrate compliance with the applicable rule or permit condition. All testing shall be performed according tot he provision of 326 IAC 3-2.1 (Source Sampling Procedures) and by methods in the approved test protocol.

Comment 3:
Section D.1.1: The incorrect formula was used for that Process Weight Rate. For over 60,000 #/hr the formula should be $E = 55.0 P^{0.11} - 40$, making E = 46.98 #/hr. This number is consistent with the PWR Table. Revise formula used ($E = 4.10 P^{0.67}$), and the maximum emission rate.

Response to Comment 3:
The Formula was revised to E = 55.0 P $^{0.11}$ – 40, producing a maximum emission rate of 46.98 pounds per hour.

Comment 4:
Section D.1.1: There is a typographical error “tan” should be to “than”.

Response to Comment 4:
This typographical error was changed as requested**.**

Comment 5.:
SectionD.1.2: I do not understand why these numbers are so low compared with the numbers used in these sections for the original permit. In the original permit the Goff and Wheelabrator Shot Blasts had PM emissions of 2.1 and 34.4 #/hr and PM-10 emissions of 7.6 and 14.7 #/hr, for PM/PM10 ratios of 0.3439 and 0.4274, respectively. The new ratios are 0.00396 and 0.00489, a significant change from the original permit. I do not understand where these numbers come from and why they have changed by an order of magnitude. Could you please explain the origin of the numbers.

Response to Comment 5:
Prior to the revision of the PM/PM10 numbers, we discussed the reason for the change with you, and you agreed that the numbers should be lowered and distributed differently, so that Ward would have future opportunities to add emissions. The new PM10 numbers were a result of the application of the new baghouse control efficiency to the uncontrolled emissions, and their conversion to pounds per hour.

Comment 6:
Section D.1.4: Under the heading Emission Notations, it specifies that “notations from each of the shot blaster stack exhausts shall be performed.” Since there is only one stack for the three shot blasters, please change the sentence to read <u>one baghouse stack</u>.

Response to Comment 6:
Condition D.1.4 has been modified as follows**:**

Daily visible emission notations of ~~each of~~ the ~~shot blaster~~ **baghouse** stack ~~exhausts~~ **controlling emissions from the three shot blasters** shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. 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. In the case of batch or discontinue operations reading shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. 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. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Comment 7:
Section D.1.5: Under the heading Pressure Readings, it specifies that the pressure drop shall be maintained within the range of 2 and 6 inches. We ask that this range be changed to 2-8 inches to give a little more latitude in design of the final system.

Response to Comment 7:
Condition D.1.5 has been modified as follows:

The permittee shall take readings of the total static pressure drop across the one (1) common baghouse controlling the three (3) shot blasters at least one a day when the shot blasting system is in operation.

Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse (BH-1) controlling the three shot blasters shall be maintained within

the range of 2 and ~~6~~ **8** inches of water or ranges established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading are outside of the above mentioned ranges for any one reading.

Comment 8:
Section D.1.6: Under the heading, Preventive Maintenance, it specifies "preventive maintenance is required for each of three (3) of the shot blasters." Preventive maintenance should be designed for the pollution prevention device.

Response to Comment 8:
The PMP is applicable to the emission units and control devices. The wording of 326 IAC 1-6-5 clarifies that the PMP includes emission units since the PMP can be changed to reduce excessive malfunctions in combustion and process equipment, as well as control devices. It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities, and will not be changed.

Comment 9:
Section D.1: Under the heading Preventive Maintenance, it specifies "The following inspection shall be performed ….". The new baghouse is a counter-pulsed cartridge unit. Therefore, the PMP should be directed to the type of baghouse used and not the shot blaster. The PM for the old Goff shot blaster should be used with the following changes:

Monthly (b) Manually check air pulse
(c) Check cartridges for buildup and tears
Quarterly (c) Clean cartridges with air nozzle

Yearly (a) Change cartridges <u>if worn</u>. If Ward could get three years out of a cartridge without causing any restricted flow, why should they not be able to? As long as it does not affect operation, this would save them some money.

Response to Comment 9:
According to 326 IAC 1-6-5, the PMP is applicable to the emission unit and the control devices. The direction of the statement is relevant according to the rule, and will not be changed. Please refer to comment #8 for additional explanation.

Comment 10:
Section D.1.9: Under the heading Operational Parameters. We feel that (b) should be changed and (c) deleted since fan speed, current and flow would be considered maintenance procedures and not common parameters to consider. This is especially true of flow since it is not an easy measurement. This was deleted from the initial permit because it was determined to be an unreasonable parameter. The actual flow is directly related to pressure drop anyway.

~~(b)~~ Counter-pulse frequency and differential pressure before & after a pulse;
~~(c)~~

Response to Comment 10:
Condition D.1.9 has been modified as follows:

The Permitee shall maintain a daily record for one (1) common baghouse (BH-1) controlling particulate matter emissions from the three (3) shot blasters of the following values:

(a) Inlet and outlet differential static pressure;

~~(b) Cleaning cycle : frequency and differential pressure;~~

(c) Pulsing frequency and duration, air pressure of pulse, differential static pressure during pulsing, and that the hopper was emptied at the end of the day for the Goff shot blaster

(d) baghouse;

~~(e) Fan speed/current and flow rate; and~~

(c) Differential static pressure before and after shaking, that the shaker was run and the hopper was emptied at the end of the day for the Wheelabrator shot blaster baghouse; and

(f) Visible observations.

The OAM Prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 11:
TSD, Page 2: Under the heading Limited PTE, PM-10 emissions for the proposed shot blasting operation are controlled at 1.94 tons per year. The Limited PTE table on page 3 has numbers in it for PM and PM-10 that are not clear as to their origin. Where does the 1.94 figure come from? The attached table summarizes our understanding of the new system with three shot blast units. The total tons of controlled PM-10 are 15.62 tons per year with total PM emissions at 18.15 tons per year. Please explain where the low numbers come from.

Response to Comment 11:
The 1.94 tons per year from the limited PTE table was calculated by applying the supplied 99.9% control efficiency to the uncontrolled emissions. Please refer to response to Comment #5 for further explanation.

Comment 12:
TSD, Page 5: Under the heading Compliance Monitoring, section 1.a.) has the baghouse pressure drop within the range of 2" – 6". We asked in Comment #7 above that the pressure drop be changed to the range of 2" – 8".

Response to Comment 12:
This change was made as requested, please refer to response to Comment #7.

Comment 13:
TSD, Page 5: Under the heading compliance Monitoring, section 1.b.) specifies "daily visible emissions observations at the shot blaster stack." Shouldn't this refer to the baghouse stack since this is the emission point for the three baghouses?

Response to Comment 13:
This change was not made, please see response to comment # 8.

Comment 14:
TSD, Section A.2: Page 6: Under the heading Emission Units and Pollution Control Summary, has the following:

a. A.2 (d) has a typo as The anew".

b. A.2 (d) line 5, "three shot blasts" may be better worded as "three shot blast units" or "three shot blasters".

Response to Comment 14:
The typographical error was changed as requested, and “three shot blasts” has been changed to “Three shot blasters”.

Comment15:
TSD, Page 7, Section D.1: Under the heading Facility Operation Conditions, in the enclosed section, (d) line 4 uses the same “three shot blasts” wording.

Response to Comment 15:
This change has been made, please see response to comment # 14

Comment 16:
TSD Section D.1.2 uses the same small numbers questioned in Comment #5 above.

Response to Comment 16:
This change was not made, please refer to comment # 5

Comment 17:
TSD, Section D.1.7: This section discusses the PM in reference to the shot blasters as opposed to the baghouse as noted in #9 above. Also, D.1.9 refers to maintenance parameters that should be removed from normal daily operational parameters.

Response to Comment 17:
This change was not made, please refer to comment # 8.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	**Ward Pattern & Engineering, Inc.**
Source Location:	**7603 Opportunity Dr., Ft. Wayne, IN., 46825**
County:	**Allen**
SIC Code:	**3361**
Operation Permit No.:	**(FESOP) 003-8477-00263**
Operation Permit Issuance Date:	**August 11, 1997**
Minor Permit Revision No.:	**003-12515-00263**
Permit Reviewer:	**Sherry Harris**

The Office of Air Management (OAM) has reviewed a modification application from Ward Pattern & Engineering, Inc. relating to the operation of aluminum heat-treating.

History

On August 12, 1996, Ward Pattern and Engineering - Heat Treat Plant submitted an application to the OAM requesting approval of a construction permit on an existing operating facility. The source is currently requesting the addition of the following operation:

(a) one (1) Wheelabrator Tumbleblast shot blaster (SB3) with a maximum steel shot blast rate of 129,000 pounds per hour, equipped with a new baghouse (BH1) for control of particulate emissions, and exhausting through one (1) stack identified as stack No. 2. The new baghouse (BH1) will replace existing baghouses (BH1) and (BH2) so that all three shot blasts (2 existing ones SB1 & SB2 & SB3 new one) will be controlled by the same baghouse. The new baghouse has a higher control efficiency than the existing baghouse. Therefore, emissions from SB1 and SB2 will decrease.

Existing Approvals

The source was issued a FESOP Operating Permit (F003-8477-00263) on August 11, 1997.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 24, 2000.

Additional information in reference to the replacement of the two existing baghouses was received on September 7, and 8, 2000

Emission Calculations

See Appendix A of this document for detailed emissions calculations Appendix A, page 1.

Potential To Emit

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

The PTE table below is for SB3 only.

Pollutant	Potential To Emit (tons/year)
PM	2260.08
PM-10	1943.67
SO_2	-
VOC	-
CO	-
NO_x	-

Justification For Revision

The source is adding two new facilities, that constitutes a modification. According to 326 IAC 2-8-11.1 (f), because this modification has a potential to emit greater than twenty-five (25) tons per year for PM/PM_{10}, it is subject to the rules of a significant permit revision.

Limited PTE

The source has accepted a federally enforceable PM-10 limit of 99 tons per year, consisting of approximately 0.82 tons per year for the insignificant activities. PM-10 emissions from the proposed shot blasting operation are controlled at 1.94 tons per year.

The table below summarizes the total potential to emit of the significant and insignificant emission units.

	Limited PTE (tons/year)						
Process/ facility	PM	PM-10	SO2	VOC	CO	NO_x	HAPs
Proposed Shot blasting	2.26	1.94	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.77	0.77	0.03	0.16	1.95	7.82	0.00
Existing Shot blasting	**1.37** ~~6.85~~	**1.18** ~~5.89~~	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	0.82	0.82	0.04	0.37	1.46	6.86	0.00
Total Emissions	**5.22** ~~8.44~~	**4.71** ~~7.48~~	0.07	0.53	3.41	14.68	0.00

The limited PTE's for the existing shot blasts will change due to the replacement of the existing baghouses. Refer to Appendix A (Emissions Calculations) for the new emissions rates. The shot blast and baghouse modification will not change the status of the stationary source because the emissions actually decrease due to the higher control efficiency of the new baghouse, which is still less than the FESOP significant levels.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.

(b) There are no National Emissions Standards for Hazardous Air Pollutants (NESHAPS) 40 CFR Part 63, applicable to this facility.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source shall prepare, maintain and implement Preventive Maintenance Plans for this shot blast operation.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source has accepted federally enforceable operation conditions, which limit emissions of PM-10 to below 100 tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the baghouses controlling the shot blasts shall be in operation at all times when the shot blasts are in operation and total PM-10 emissions shall not exceed 97.5 tons per year (99 tons/yr – 1.49 tons/yr from other sources). Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

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

326 IAC 6-3-2 (Particulate Emission Limitations)

The provisions of 326 IAC 6-3-2 are applicable to the Abrasive Shot blasting process operation. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the Abrasive Shot Blasting operation shall be limited as follows:

Equation from 326 IAC 6-3-2: $E = 4.10 * (P^{O.67})$

Wheelabrator Shot blaster
Process Weight Rate, P = 64.5 tons/hr per machine
Allowable Emission Rate, E = 66.9 lbs/hr

Even though 66.90lb/hr = 293.02 tons/yr, to comply with 326-IAC 2-8, PM_{10} is limited to 1.94 tons per year and PM is limited to 2.26. Potential controlled emissions from the shot blast unit is 2.26 tons per year. Therefore, the Shot Blasting operation will comply with 326 IAC 6-3-2.

The compliance monitoring requirements applicable to this source is as follows:

Compliance Monitoring

1. The shot blasters has applicable compliance monitoring conditions as specified below:

a) The total static pressure drop across the baghouse controlling the Wheelabrator Shot blasters must be measured and recorded daily. The pressure drop for the unit shall be maintained within the range of 2 and 6 inches of water. If the pressure drop is outside this range, corrective action shall be taken in accordance with the Preventive Maintenance Plan.

b) Daily visible emissions observations at the shot blaster stack shall be performed by a trained employee, i.e., an employee who has worked at the plant at least one month and

has been trained in the appearance and characteristics of normal visible emissions. The employee will record whether the emissions are normal or abnormal, and if the reading is abnormal, corrective action shall be taken in accordance with the Preventive Maintenance Plan.

These monitoring conditions are necessary because the baghouse for the shot blasters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

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

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

Proposed Changes

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Section	**Description**	**Page No.**
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D.1	**FACILITY OPERATION CONDITIONS**	**20**
	~~Two (2) shot blasters~~	
	Three (3) shot blasters	
	FORMS	
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	Affidavit of Construction (if applicable)	

A.2 Emission Units and Pollution Control Summary

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

(a) one (1) natural gas fired solution furnace (ID No. 1) rated at 12.75 million (MM) Btu/hr (includes a new 4.5 MMBtu/hr addition to increase the capacity from 8.25 MMBtu/hr), exhausting through two (2) stacks, identified as Stack Nos. 5 and 31;

(b) one (1) Goff Spin Blast shot blaster, identified as SB1, with a maximum steel shot blast rate of 26,640 pounds per hour, equipped with a common baghouse (BH-1) for control of particulate emissions, and exhausting through one (1) stack, identified as Stack No. 2; and

(c) one (1) Wheelabrator Tumbleblast shot blaster, identified as SB2, with a maximum steel shot blast rate of 51,600 pounds per hour, equipped with a common baghouse (BH-1) for control of particulate emissions, and exhausting through one (1) stack, identified as Stack No. 2.

(d) one (1) Wheelabrator Tumbleblast shot blaster (SB3) with a maximum steel shot blast rate of 129,000 pounds per hour, equipped with a new baghouse (BH-1) for control of particulate emissions, exhausting through Stack No. 2. The anew baghouse (BH-1) will replace the existing baghouses (BH-1) and (BH-2) so that all three shot blasts will be controlled by the same baghouse. The new baghouse has a higher control efficiency than the existing baghouse.

The facility operation condition box in Section D.1 had been revised as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

(b)	one (1) Goff Spin Blast shot blaster, identified as SB1, with a maximum steel shot blast rate of 26,640 pounds per hour, equipped with a **common** baghouse (BH-1) for control of particulate emissions, and exhausting through one (1) stack, identified as Stack No. **2;** and
(c)	one (1) Wheelabrator Tumbleblast shot blaster, identified as SB2, with a maximum steel shot blast rate of 51,600 pounds per hour, equipped with a **common** baghouse (BH-1) for control of particulate emissions, and exhausting through one (1) stack, identified as Stack No. 2.
(d)	**one (1) Wheelabrator Tumbleblast shot blaster, identified as (SB3), with a maximum steel shot blast rate of 129,000 pounds per hour, equipped with a new baghouse (BH-1) for control of particulate emissions, and exhausting through Stack No. 2. The new baghouse (BH-1) will replace existing baghouses (BH-1) and (BH-2) so that all three shot blasts will be controlled by the same baghouse. The new baghouse has a higher control efficiency than the existing baghouse.**

Due to the addition of emissions causing an exeedance of the federally enforceable PM-10 emission limit of 99, the limits are being changed. The source is requesting the limits be lowered. D.1.1 is also being revised to show the correct limits based on 326 IAC 6-3-2.

D.1.1 Particulate Matter

Pursuant to 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate matter emissions from the Goff shot blaster **(SB1) and** Wheelabrator shot blasters (SB2**) and (SB3)** shall not exceed ~~22.1~~ 23.24 ~~pounds per hour, and the particulate matter emissions from the Wheelabrator shot blaster **(SB2)** shall not exceed~~ ~~34.4~~ 36.19**, and 66.9** pounds per hour, **respectively**.

The total PM emissions for the source shall be less than 250 tons/yr, thus, 326 IAC 2-2 does not apply.

D.1.2 Particulate Matter 10 Microns (PM-10)

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the Goff shot blaster **(SB1)** and**,** ~~the~~ Wheelabrator shot blaster **s** ~~(SB1),~~ **(SB2) and SB3)** shall not exceed ~~7.6~~ 0.092**,** ~~and 14.7~~ 0.177, and 0.443 pounds per hour, respectively, including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.5 Pressure Readings

The Permittee shall take readings of the total static pressure drop across the **one** (1) ~~two (2)~~ **common** baghouse controlling the ~~two (2)~~ **three (3)** shot blasters at least once a day when the shot blasting system is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across ~~each of~~ the ~~baghouses~~ **baghouse (BH-1)** controlling the ~~Goff shot blaster shall be maintained within the range of 4 and 6 inches of water, and the pressure drop across the baghouse controlling the Wheelabrator~~ the three shot blaster**s** ~~s~~ shall be maintained within the range of 2 and ~~4~~ **6** inches ~~of~~ water or ranges established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure readings are outside of the above-mentioned ranges for any one reading.

The instrument used for determining the pressure shall comply with Condition C.12 - Pressure

Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.6 Preventive Maintenance [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for each of the ~~two (2)~~ **three (3)** shot blasters.

D.1.7 Preventive Inspections
The following inspections shall be performed when the ~~two (2)~~ **three (3)** shot blasters are operating in accordance with the Preventive Maintenance Plan prepared pursuant to Condition B.13:

For the Goff shot blaster (SB1):

Twice weekly:
- (a) Inspect for damage
- (b) Inspect blower
- (c) Inspect refuse for useable shot
- (d) Inspect manometer
- (e) Inspect air lines
- (f) Inspect pulsaters
- (g) Inspect and grease bearings
- (h) Inspect motor and wire
- (i) Empty hopper
- (j) Check duct work for build-up and wear
- (k) Rotation of blower
- (l) Check belts & pulleys for tightness and wear

Monthly:
- (a) Check fan housing for dirt build-up
- (b) Manual check air pulse for bags
- (c) Shut down system & check bags for build-up and tears
- (d) Check for build-up on walls

Quarterly:
- (a) Take air pulsers apart and clean
- (b) Open duct work & check for build-up in piping
- (c) Clean bags with air nozzle

Yearly:
- (a) Change bags

For the Wheelabrator shot ~~blaster~~ **blasters** (SB2) **and (SB3)**:

Daily:
- (a) Run shaker
- (b) Empty hopper
- (c) Inspect for useable shot

Twice weekly:
- (a) Inspect for damage
- (b) Inspect blower
- (c) Inspect manometer

(d) Inspect air lines
(e) Inspect and grease bearings
(f) Inspect motor and wiring
(g) Check duct work for build-up and wear
(h) Rotation of blower
(i) Check belts & pulleys for tightness and wear

Monthly:

(a) Check fan housing for dirt build-up
(b) Manual check shaker system
(c) Shut down system & check bags for build-up and tears
(d) Check for build-up on walls

Quarterly:

(a) Open duct work & check for build-up in piping
(b) Clean bags with air nozzle

Yearly:

(a) Change bags

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

D.1.9 Operational Parameters

The Permittee shall maintain a daily record for the ~~two (2) baghouses~~ **one (1) common baghouse** (BH-1) controlling particulate matter emissions from the ~~two (2)~~ **three (3)** shot blasters of the following values:

(a) Inlet and outlet differential static pressure;

(b) Cleaning cycle: frequency and differential pressure;

(c) Fan speed/current and flow rate; and

(d) Visible observations.

Conclusion

The construction of this shot blast operation shall be subject to the conditions of the attached proposed **Significant Permit Revision 003-12515-00263**

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a Federal Enforceable State Operating Permit
Significant Permit Revision

for Ward Pattern & Engineering
in Allen County

FESOP No.: F003-8477-00263
Significant Permit Revision No.: 003-12515

Notice is hereby given that the above-mentioned company, located at 7603 Opportunity Dr., Ft. Wayne Indiana, 46825**,** has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Significant Permit Revision to its Federally Enforceable State Operating Permit (FESOP) issued on August 11, 1997 for the addition of one wheelabrator tumbleblast shot blaster with a new baghouse (BH1). The new baghouse (BH1) will replace existing baghouses (BH1 & BH2) so that all three shotblasts will be controlled by the same baghouse. Due to the higher control efficiency of the new baghouse, the PM/PM_{10} emissions will decrease. The PM_{10} emissions are limited to less than 100 tons per year.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit revision should or should not be issued. Appropriate comments should be related to any air quality issues, interpretation of the state and federal rules, calculations made, technical issues, or the effect that the operation of this source would have on any aggrieved individuals. IDEM, OAM does not have jurisdiction in specifying and implementing requirements for zoning, odor or noise. For such issues, please contact your local officials.

A copy of the application and draft permit revision is available for examination at the Allen County Public Library, 900 Webster Ave., Ft. Wayne, Indiana, 46802. A copy of the draft permit revision is also available for examination atwww.state.in.us/idem/oam/index.html. All statements, along with supporting documentation, should be submitted in writing to the IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If adverse comments concerning the **air pollution impact** of this draft permit revision are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the OAM, at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have fifteen (15) days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Sherry Harris, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Sherry Harris or extension 4-1207, or dial (317) 234-1207.

Paul Dubenetzky, Chief
Permits Branch

Office of Air Management
sah