

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)**

**Indiana Department of Environmental Management
Office of Air Quality
and
Hammond Department of Environmental Management
-Air Pollution Control Division-**

**George O'Day's Shop, Inc.
19 - 143rd Street
Hammond, Indiana 46327-1313**

(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 2-8 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.: F089-12582-00459	
Issued by: _____ Ronald L. Novak, Director Hammond Department of Environmental Management Air Pollution Control Division	Issuance Date: _____ Expiration 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 Quality (OAQ) and the Hammond Department of Environmental Management (HDEM). 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 2-8-3(b)]

The Permittee owns and operates a Locker and Towel Cabinet Stripping and Repainting Facility.

Authorized individual:	Steve O'Day
Source Address:	19 - 143 rd Street, Hammond, Indiana 46327-1313
Mailing Address:	526 E. 114 th Place, Chicago, IL 60628-5104
SIC Code:	3479 – Stripping & Repainting Lockers & Towel Cabinets
Source Location Status:	Lake
County Status:	Attainment/Unclassifiable for NO ₂ , CO and Lead Primary Nonattainment for SO ₂ , Moderate Nonattainment for PM ₁₀ , and Severe Nonattainment for Ozone.
Source Status:	Federally Enforceable State Operating Permit (FESOP) Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following two (2) emission units and pollution control devices constructed December 1, 2000:

- (a) One (1) Devilbiss spray paint booth, identified as Booth 1, with a maximum rate of 12.5 towel cabinets or 40 interior mechanisms per hour, using dry particulate filters for overspray control, identified as CE-1, and exhausting to stack S-1. An electric drying oven follows Booth 1 and exhausts to stack S-2.
- (b) One (1) TBI-Team Blowtherm spray paint booth, identified as Booth 2, with a maximum rate of 6.25 lockers per hour, using dry particulate filters for overspray control, identified as CE-2, and exhausting to stack S-3. The lockers are air dried.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Space heaters, process heaters, or boilers using the following fuels.

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

1. Twenty (20) space heaters @ 0.085 MMBtu/hr each - total 1.7 MMBtu/hr.
 2. Ten (10) space heaters @ 0.20 MMBtu each – total 2.0 MMBtu/hr.
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
1. Dry particulate filters (CE-1) for PM control at Booth 1 changed as needed.
 2. Dry particulate filters (CE-2) for PM control at Booth 2 changed as needed.
- (c) Paved and unpaved roads and parking lots with public access.

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 Quality (OAQ) and the Hammond Department of Environmental Management (HDEM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) 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, OAQ and HDEM 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.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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, the applicable definitions found in the statutes or regulations (IC 13-11, 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 original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, HDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, 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 HDEM.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.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)] [326 IAC 2-8-5(a)(4)]

- (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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM-OAQ and HDEM within a reasonable time, any information that IDEM-OAQ and HDEM 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. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM-OAQ, and HDEM copies of the records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM-OAQ and HDEM 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, except those specifically designated as not federally enforceable, 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, 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, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

- (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 initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications 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 15th of each year to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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-OAQ and HDEM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or 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 consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM-OAQ and HDEM may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) 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; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs 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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM-OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM-OAQ and HDEM. IDEM-OAQ or HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

B.14 Emergency Provisions [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 in 326 IAC 2-8-12.
- (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 in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM-OAQ and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM:

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

and

HDEM:

Telephone No.: 219-853-6306
Facsimile No.: 219-853-6343

Failure to notify IDEM-OAQ and HDEM by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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 2-8-4(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.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM-OAQ and HDEM 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-OAQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition 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 (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (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) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

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) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM-OAQ or HDEM 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 2-8-8(a)]
- (c) Proceedings by IDEM-OAQ or HDEM 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 2-8-8(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-OAQ or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM-OAQ or HDEM 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-OAQ and HDEM and shall include 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(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (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-OAQ and HDEM on or before the date it is due.
- (2) If IDEM-OAQ and HDEM 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 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-OAQ and HDEM 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-OAQ and HDEM any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this 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) Any approval required by 326 IAC 2-8-11.1 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);
- (4) The Permittee notifies the:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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 2-8-15(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-OAQ and HDEM in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (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 2-8-15(a) and the following additional conditions:

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(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 2-8-15(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). No prior notification of IDEM-OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM-OAQ, HDEM, 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 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;
- (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 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.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM-OAQ and HDEM within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM-OAQ or HDEM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), 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 OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-3 (Emission Offset), emissions of particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) 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%) 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 non-overlapping 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 or 326 IAC 4-1-6. 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(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule, or in this permit, 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.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable 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 applicable 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 2-8-4(3)]

C.10 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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM-OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM-OAQ and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM-OAQ and HDEM if the source submits to IDEM-OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions units, compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

- (a) 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.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument 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.
- (c) The Permittee may request the IDEM-OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual 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).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (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-OAQ and HDEM upon request and shall be subject to review and approval by IDEM-OAQ or HDEM. 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) Reasonable response steps that may 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 reasonable 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, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
 - (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. 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.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning 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.
 - (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
 - (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and recordkeeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 response actions. The Permittee shall submit a description of these response actions to IDEM-OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (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-OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM-OAQ may extend the retesting deadline.
- (c) IDEM-OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15th of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) 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-OAQ and HDEM on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports, 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.
- (b) Unless otherwise specified in this permit, 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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

- (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-OAQ and HDEM on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) 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. Reporting periods are based on calendar years.

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.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Locker and Towel Cabinet Stripping and Repainting

Two (2) paint booths, identified as Booth 1 and Booth 2:

Booth 1 has a maximum capacity of 12.5 towel cabinets or 40 interior mechanisms per hour; uses dry filters for over spray control, and exhausting to stack S-1.

Booth 2 has a maximum capacity of 6.25 lockers per hour, uses dry filters for over spray control, and exhausts to stack S-3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five-tenths (3.5) pounds per gallon of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (c) The permittee shall not cause any emissions from the paint booths to create any nuisance as specified in the City of Hammond Air Quality Control Ordinance 3522 (as amended), Article VI, Section 6.11 – Nuisance Abatement.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-3] [326 IAC 2-7]

Total input of volatile organic compounds (VOC) for all operations at this facility, including coatings, dilution solvents, and cleaning solvents, shall be limited to twenty-five (25) tons per 12 consecutive month period.

Therefore, the requirements of Emission Offset (326 IAC 2-3), and the Part 70 Operating Permit Program (326 IAC 2-7) will not apply.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 2-7]

Hazardous Air Pollutants (HAPs) shall be limited as follows:

- (a) Total input of any one (1) single hazardous air pollutant (HAP) for all operations at this facility shall not exceed ten (10) tons per 12 consecutive month period.
- (b) Total input of any combination of HAPs for all operations at this facility shall not exceed twenty-five (25) tons per 12 consecutive month period.

Therefore, the requirements for Major Sources of Hazardous Air Pollutants (326 IAC 2-4.1-1) and the Part 70 Operating Permit Program (326 IAC 2-7) will not apply.

D.1.4 Particulate Matter (PM) [326 IAC 2-1.1-10 Local Agencies] [326 2-7-1(39) Definition – Technology-based Emission Limit]

Pursuant to the Hammond Ordinance 7102 which uses as a minimum the standards found in Title 326 of the Indiana Administrative Code, the PM emissions from the two (2) paint booths, Booth 1 and Booth 2 shall not exceed 4.3 tons per year or 0.99 pounds per hour. This is a technology-based emission limit based on the dry filter specifications from the permittee's FESOP application and the potential emissions after controls as calculated by the permittee and the Hammond Department of Environmental Management.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the dry filter systems of Booth 1 and Booth 2.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 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.

- (a) The permittee shall use only the coatings for which the above information has been submitted to and approved by IDEM, OAQ or HDEM.
- (b) Use of the two (2) paint booths, Booth 1 or Booth 2 for any other units, rates, or coatings must be approved by IDEM, OAQ or HDEM.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.8 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each month based on the total amount of the single most used hazardous air pollutant and the total amount of the combination of all hazardous air pollutants used for the most recent twelve (12) month period.

D.1.9 Particulate Matter (PM)

Compliance with the PM limitations of Condition D.1.4 shall be determined by meeting all of the following requirements:

- (a) The dry particulate filters shall be operating at all times when the two (2) paint booths (Booth 1 and Booth 2) are in operation.
- (b) The dry particulate filters shall be maintained, at a minimum, according to the manufacturer's specifications.

- (c) All of the Compliance Monitoring and Record Keeping Requirements for the dry particulate filters shall be up to date, complete, and sufficient to establish compliance.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booths (stacks S-1 and S-3) while the booths are in operation. 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 of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. 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. 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound (VOC) emission limits established in Condition D.1.2.
 - (1) The amount (in gallons) and VOC content (in pounds per gallon) of each coating, dilution solvent, and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The total weight of VOCs emitted for each compliance period. Each compliance period shall be the consecutive twelve (12) month period which includes the most recent month and the previous eleven (11) months.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the hazardous air pollutant (HAP) emission limits established in Condition D.1.3.
 - (1) The amount (in gallons) and HAP content (in pounds per gallon) of each coating, dilution solvent, and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) The total weight of the single most emitted HAP and the total weight of all HAPs emitted for each compliance period. Each compliance period shall be the consecutive twelve (12) month period which includes the most recent month and the previous eleven (11) months.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.2, D.1.3, and D.1.11 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall annually submit a compliance certification report in accordance with Condition B.12 - Annual Compliance Certification [326 IAC 2-8-5(a)(1)].

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: **George O'Day's Shop, Inc.**
Source Address: 19 – 143rd Street, Hammond, Indiana 46327-1313
Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
FESOP No.: **F089-12582-00459**

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:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- 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 QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320
Phone: 219-853-6306
Fax: 219-853-6343**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: **George O'Day's Shop, Inc.**
Source Address: 19 – 143rd Street, Hammond, Indiana 46327-1313
Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
FESOP No.: **F089-12582-00459**

This form consists of 2 pages

Page 1 of 2

<p>___ This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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• 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
--

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:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:	
Date/Time Emergency was corrected:	
Was the facility being properly operated at the time of the emergency? 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:	
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 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:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-**

VOC Compliance Monitoring Form

Source Name: **George O'Day's Shop, Inc.**
Source Address: 19 - 143rd Street, Hammond, Indiana 46327-1313
Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
FESOP No.: **F089-12582-00459**
Limit: **25 Tons per year; 12 month rolling total**

Reporting Quarter: _____ **Year:** _____

Month	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total

— No deviation occurred in this month.
— Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 -AIR POLLUTION CONTROL DIVISION-**

HAPs Compliance Monitoring Form

Source Name: **George O'Day's Shop, Inc.**
 Source Address: 19 - 143rd Street, Hammond, Indiana 46327-1313
 Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
 FESOP No.: **F089-12582-00459**
 Limit: **10 Tons per year single HAP; 25 Tons per year combined HAPs;
 12 month rolling total**

Reporting Quarter: _____ **Year:** _____

Month	Single HAP Usage This Month	Single HAP Usage Previous 11 Months	Single HAP Usage 12 Month Total

Month	Total HAPs Usage This Month	Total HAPs Usage Previous 11 Months	Total HAPs Usage 12 Month Total

— No deviation occurred in this month.
 — Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 -AIR POLLUTION CONTROL DIVISION-**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: **George O'Day's Shop, Inc.**
 Source Address: 19 – 143rd Street, Hammond, Indiana 46327-1313
 Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
 FESOP No.: **F089-12582-00459**

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
Hammond Department of Environmental Management
Air Pollution Control Division**

Addendum to the Technical Support Document for a
Federally Enforceable State Operating Permit - FESOP

Source Name: **George O'Day's Shop, Inc.**
Source Location: 19 – 143rd Street, Hammond, Indiana
County: Lake
SIC Code: 3479 – Stripping and Repainting Lockers and Towel Cabinets
Operation Permit No.: **F089-12582-00459**
Permit Reviewer: Ronald Holder

On October 27, 2000, the Hammond Department of Environmental Management (HDEM) had a notice published in the Hammond Times, Hammond, Indiana, stating that George O'Day's Shop, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a facility for the Stripping and Repainting of Lockers and Towel Cabinets. The notice also stated that HDEM proposed to issue a permit for this operation 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 November 14, 2000, George O'Day's Shop, Inc. submitted comments on the proposed FESOP. Upon review, the HDEM has decided to make the following responses and/or revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes. This document will also address the latest revisions to the FESOP model, dated November 16, 2000, and January 5, 2001, from the Indiana Department of Environmental Management – IDEM.

1. Comment:

The Total HAPs PTE is listed in the TSD as 16.58 TPY, which is less than the MACT or Title V applicability threshold of 25 TPY or the permit limit of 25 TPY. Therefore, the facility should not have to track and report total HAPs on a monthly basis to demonstrate compliance with these rules. Therefore, we request changes to the following sections: TSD pg 4 of 7 "Potential to Emit After Issuance"; Draft FESOP Sections D.1.3 (b); D.1.8; and D.1.11 (b)(2). We also request deletion of the form for reporting the combination of all HAPs.

HDEM's Response

HDEM agrees that the total HAPs potential to emit for this source is less than the above-mentioned thresholds, however, reporting of single and total HAPs will be necessary to demonstrate compliance with FESOP limitations. The permit limitation of 25 TPY is appropriate for this type of permit. HDEM has made the following changes to the TSD and FESOP to simplify record keeping and reporting requirements for VOC, single and total HAPs.

Change to TSD page 4 of 7

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Combination HAPs
Stripping & Repainting Lockers & Towel Cabinets	4.30	N/A	24	N/A	N/A	9	24 16.58
Total Emissions	4.30	---	24	---	---	9	24 16.58

Changes to FESOP

Section D.1.3 (b) which restricts input of hazardous air pollutants HAPs to twenty-five (25) tons per year is a valid limitation for this type of permit. Although the company's actual potential is less than this threshold, the record keeping and reporting requirements for single and total HAPs in sections D.1.8 and D.1.11 will remain as follows:

D.1.8 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each month based on the total amount of the single most used hazardous air pollutant and the total amount of the combination of all hazardous air pollutants used for the most recent twelve (12) month period.

D.1.11 Record Keeping Requirements

- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the hazardous air pollutant (HAP) emission limits established in Condition D.1.3.
 - (1) The amount (in gallons) and HAP content (in pounds per gallon) of each coating, dilution solvent, and cleaning solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The total weight of the single most emitted HAP and the total weight of all HAPs emitted for each compliance period. Each compliance period shall be the consecutive twelve (12) month period which includes the most recent month and the previous eleven (11) months.

The following section on page 36 of 38, for reporting total HAPs is hereby deleted as follows:

Combination of all HAPs

Current Month Emissions			
Coating, Dilution Solvent, or Cleaning Solvent	A (gallons)	B (pounds per gallon) other HAPs	C (lbs)
Red Line Wash			
Xylene		1.49	
Toluene		1.08	
Methyl Alcohol		0.83	
Methyl Ethyl Ketone		0.42	
Total for the Month (pounds) (sum of column C)			D =
Total for the Month (tons) (D ÷ 2000)			E =
Total of Combination of all HAPs (E + E from previous page)			F =
Previous 11 Months Emissions			
Month 11			
Month 10			
Month 9			
Month 8			
Month 7			
Month 6			
Month 5			
Month 4			
Month 3			
Month 2			
Month 1			
Total Previous 12 Months			
Total for the Previous 12 Months (tons) (Add Current plus 11 previous months)			

- Equations: C = other HAP emissions (lbs) = A x B
- D = Total other HAP emissions for the month (pounds) = sum of column C
- E = Total other HAP emissions for the month (tons) = D ÷ 2000
- F = Total of all HAP emissions for the month (tons) = E + E from previous page

2. Comment:

The permit should not specifically require IDEM/HDEM approval for changes of paints at the facility (D.1.6 (a) and (b)) unless the change results in an increase in the facility PTE. Compliance with D.1.6 is normally demonstrated by maintaining MSDS's for all paints at the facility available for review by an inspector. Compliance is also assured through the Annual Compliance Certification which specifically states whether all materials used are compliant with the permit. Finally, the facility also must submit MSDS's for any or all materials in use upon request by HDEM/IDEM.

However, requiring pre-submittal and pre-approval of coatings places an undue paperwork and time burden upon the facility when rapid decisions and many "what-if" evaluations are required. Pre-approval inappropriately inserts HDEM/IDEM into the facility's decision-making process and places a burden upon HDEM/IDEM to respond immediately to coating approval requests. It should be the responsibility of the facility to choose compliant coatings and the right of HDEM/IDEM to monitor those choices through inspections, annual certifications and MSDS submittals upon request. Therefore, we request that subparagraphs (a) and (b) of D.1.6 be deleted.

HDEM's Response

HDEM and IDEM have made their permit determinations and approvals based on the information submitted by the company in their application. Compliance of coatings with 326 IAC 8-1-2 and 326 IAC 8-1-4 must be established prior to use at the facility. Hammond Air Quality Ordinance #3522 (as amended), Section IV, Article 4.1, also requires the approval of alterations of any process that may be a source of an air contaminant. HDEM must also ensure compliance with local fire and zoning ordinances that regulate the storage and handling of potentially hazardous materials. Therefore conditions D.1.6 (a) and (b) shall remain as written. Approvals for alternate coatings can be made immediately provided the appropriate and compliant MSDS and/or VOC data sheet has been submitted to the Department for review.

3. Comment

The quarterly submittal forms for VOC and HAP usage list the specific material currently in use at the facility. The specific materials should not be written into the permit since they will change during the 5-year life of the permit. The spaces on the quarterly submittals should be blank. We also request a simpler submittal form for VOC and HAP usage such as is attached to this letter.

HDEM's Response

HDEM agrees that the reporting form as drafted would be less cumbersome if it were not product specific. The Department also recognizes that permit amendments or modifications for coating changes in the future would be unreasonably complicated and time consuming. Also, according to condition D.1.11, the company would be able to provide at the request of the Department, any calculations performed for the VOC and HAP quarterly usage reports. Therefore, the following VOC and HAP quarterly reporting forms are modified as follows:

This part of the VOC Compliance Reporting Form on page 33 of 38 is deleted and replaced.

Reporting Month: _____ **Year:** _____

Current Month Emissions			
Coating, Dilution Solvent, or Cleaning Solvent	A (gallons)	B (lbs VOC per gallon)	C (lbs)
Rust Buster		3.23	
308E		8.62	
Cabinets white enamel		2.14	
Mechanisms gray enamel		1.20	
Locker gray enamel		1.41	
New locker beige enamel		1.44	
Glycol Ether		7.53	
Red Line Wash		5.91	
Total for the Month (pounds) (sum of column C)			D =
Total for the Month (tons) (D : 2000)			E =
Previous 11 Months Emissions			
Month 11			
Month 10			
Month 9			

Month 8	
Month 7	
Month 6	
Month 5	
Month 4	
Month 3	
Month 2	
Month 1	
Total Previous 12 Months	
Total for the Previous 12 Months (tons) (Add Current plus 11 previous months)	

Equations: C = VOC emissions per coating (pounds) = A x B
 D = Total VOC emissions for the month (pounds) = sum of column C
 E = Total VOC emissions for the month (tons) = D : 2000

This table replaces the part of the VOC Compliance Reporting Form that was deleted.

Reporting Quarter: _____ Year: _____

Month	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total

4. Comment:

The submittal of the daily/weekly/monthly filter & overspray observations is not necessary or normal for paint booth operations. The records of observations are normally maintained at the site available for inspectors. Therefore, we request a change to the Draft FESOP Section D.1.12 (a) and the deletion of the Visual Observations form from the permit.

HDEM's Response

Submittal of the daily/weekly/monthly filter and overspray observations is not necessary. These records are kept on site and are made available during routine inspections. Record keeping in section D.1.11 (c) requires the source to maintain a log of the visual observation requirements in D.1.10, therefore, the Visual Observation Form on page 38 of 38 can be deleted.

The following changes are made to section D.1.12 Reporting Requirements:

D.1.12 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.2, D.1.3, ~~D.1.10~~, and D.1.11 shall be submitted to the addresses listed in Section C, General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The following Visual Observation Form is entirely deleted as follows

~~HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT~~
~~- AIR POLLUTION CONTROL DIVISION -~~
 AND
 INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT, COMPLIANCE DATA SECTION

FESOP- Visual Observations Form

Source Name: George O'Day's Shop, Inc.
 Source Address: 19 – 143rd Street, Hammond, Indiana 46327-1313
 FESOP No.: F089-12582-00459

Month: _____ Year: _____

Daily Filter Inspections – Weekly Overspray Observations – Monthly OverSpray Inspections (Normal or Abnormal)							
	<i>Booth 1</i>			<i>Booth 2</i>			<i>Corrective Action for abnormal condition</i>
	Daily	Weekly	Monthly	Daily	Weekly	Monthly	
Day 1							
Day 2							
Day 3							
Day 4							
Day 5							
Day 6							
Day 7							
Day 8							
Day 9							
Day 10							
Day 11							
Day 12							
Day 13							
Day 14							
Day 15							
Day 16							
Day 17							
Day 18							
Day 19							
Day 20							
Day 21							
Day 22							
Day 22							
Day 23							
Day 24							
Day 25							
Day 26							
Day 27							
Day 28							
Day 29							
Day 30							
Day 31							

On November 17, 2000, HDEM received a memo from IDEM updating the 8/3/00 version of the FESOP model to the new 11/16/00 model. Upon review, the HDEM has decided to make the following revisions to this FESOP permit based on that memo (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes. Also, as of January 5, all references to the Office of Air Management have been changed to the Office of Air Quality, accordingly, OAM changes to OAQ.

Front Page

- The expiration date has been added to the signature box. The expiration date is exactly 5 years after the issuance date. For example, if the permit was issued December 13, 1996, the expiration date would be December 13, 2001.

Operation Permit No.: F089-12582-00459	
Issued by: _____ Ronald L. Novak, Director Hammond Department of Environmental Management Air Pollution Control Division	Issuance Date: _____ Expiration Date: _____

Section A

- A.1 (General Information) the responsible official section can be a name or a title. We are no longer going to include the phone number of the contact person, because it is cumbersome to do an administrative amendment every time they change the number.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a Locker and Towel Cabinet Stripping and Repainting Facility.

Authorized individual:	Steve O'Day
Source Address:	19 - 143 rd Street, Hammond, Indiana 46327-1313
Mailing Address:	526 E. 114 th Place, Chicago, IL 60628-5104
Phone Number:	773-264-6410
SIC Code:	3479 – Stripping & Repainting Lockers & Towel Cabinets
Source Location Status:	Lake
County Status:	Attainment/Unclassifiable for NO ₂ , CO and Lead Primary Nonattainment for SO ₂ , Moderate Nonattainment for PM ₁₀ , and Severe Nonattainment for Ozone.
Source Status:	Federally Enforceable State Operating Permit (FESOP) Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

- A.2 (Emission Units and Pollution Control Equipment Summary) is modified as follows to include the date of construction.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following two (2) emission units and pollution control devices **constructed December 1, 2000:**

Section B

1. B.3 (Permit Term) language has been added to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be 5 years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

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~~ **original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

2. B.8 (Duty to Supplement and Provide Information) The condition has been reworded to match the language in the rule.

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

- (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~~ **Quality**
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM-OAMQ and HDEM within a reasonable time, any information that IDEM-OAMQ and HDEM 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. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). **Upon request, the Permittee shall also furnish to IDEM-OAMQ and HDEM copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 2-8-4(5)(E)]**
- (c) ~~Upon request, the Permittee shall also furnish to IDEM-OAM and HDEM copies of records required to be kept by this permit.~~ The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. ~~If requested by IDEM-OAM, or the U.S. EPA, to furnish~~ **When furnishing** copies of requested records directly to U. S. EPA, ~~then the Permittee must furnish record directly to the U. S. EPA.~~ the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

3. B.10 (Compliance with Permit Conditions) (c) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures. In order to track the FESOP rules instead of the Title V rules, “constitutes a violation of the Clean Air Act and” has been removed from this condition.

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, except those specifically designated as not federally enforceable, ~~constitutes a violation of the Clean Air Act and~~ 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.
- (c) **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.**

4. B.11 (Certification) (b) has been modified to clarify when a certification is needed.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.

5. B.12 (Annual Compliance Certification) paragraph (a) has been revised to clarify that the initial certification is from the date of issuance until Dec. 31.

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

- (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 **initial** certification shall cover the time period from ~~January 1~~ **the date of final permit issuance through** to December 31 of the ~~previous same~~ year. **All subsequent certifications 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 15th of each year to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division

5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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**

6. B.13 (Preventive Maintenance Plan) the record keeping requirements have been added to this condition.

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) 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; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond ~~it's~~ **the Permittee's** control, the PMPs 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~~ **Quality**
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM-OAMQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM-OAMQ and HDEM. IDEM-OAMQ or HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP

does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.**

7. B.14 (Emergency Provisions) a reference to the Emergency Occurrence Report Form has been added to B.14(b)(5). The emergency form is for emergencies only, and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. Paragraph (d) part of the first sentence has been deleted. Since we know it is a FESOP source, then we also know the malfunction rule has been superceded by the emergency rule. Paragraph (f) “compliance” has been changed to “accordance”.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted ~~notice either in writing or facsimile, of the emergency to:~~ **the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:**

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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 2-8-4(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.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (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-OAMQ and HDEM 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-OAMQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

8. B.15 (Deviations from Permit Requirements and Conditions) we are no longer requiring sources to report deviations in 10 days. Now they will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since we relaxed the 10 day notification to a quarterly report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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~~ **Data Section**, Office of Air ~~Management~~ **Quality**
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

~~within ten (10) calendar days from the date of the discovery of the deviation, using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~

The notification by the permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (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)(2) Failure to implement elements of the Preventive Maintenance Plan unless such~~

failure has caused or contributed to a deviation.

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

9. B.16 (Permit Modification, Reopening, Revocation and Reissuance, or Termination) the "and" has been changed to "or" since the reopening could be done by either the local or the state agency.

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) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM-OAMQ or HDEM 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 2-8-8(a)]

(c) Proceedings by IDEM-OAMQ or HDEM 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 2-8-8(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-OAMQ and or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM-OAMQ and or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

10. B.18 (Permit Amendment or Revision) 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore this condition has been revised to clarify that. EPA has also requested this change.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). ~~only if a certification is required by the terms of the applicable rule.~~

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

11. B.20 (Source Modification Requirement) 326 IAC 2 has been added to make the condition more complete. The language “applicable provisions” has been removed because it is unnecessary.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by ~~the applicable provisions of~~ **326 IAC 2** and 326 IAC 2-8-11.1.

12. B.21 (Inspection and Entry) “At reasonable times” has not been deleted because unlike the Title V rules the FESOP rules does state this.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be

required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM-OAMQ, HDEM, 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 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;

(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 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 2-8-5(a)(4)]~~

13. B.22 (Transfer of Ownership or Operational Control) 326 IAC 2-8-3(d) requires all applications to be certified by the authorized individual, therefore this condition has been revised to clarify that.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

14. B.23 (Annual Fee Payment) add the following rule cite to paragraph (a).

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM-OAMQ and HDEM within thirty (30) calendar days of receipt of a billing. **Pursuant to 326 IAC 2-7-19(b)**, if the Permittee does not receive a bill from IDEM-OAMQ or HDEM, the applicable fee is due April 1 of each year.
- (b) **Except as provided in 326 IAC 2-7-19(e)**, 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 **OAMQ**, Technical Support and Modeling Section), to determine the appropriate permit fee.

Section C

1. C.7 (Operation of Equipment) the following revisions were made to clarify the condition.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided **by statute, rule, or** in this permit, 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.

2. C.8 (Stack Height) language has been added to clarify which parts of 326 IAC 1-7 are not federally enforceable.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.**

3. C.9 (Asbestos Abatement Projects) the rule cite in the title was changed to make it more generalized.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.440] , **Subpart M]**

4. C.10 (Performance Testing) “within” has been changed to “not later than”.

C.10 Performance Testing [326 IAC 3-6]

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM-OAMQ and HDEM **within not later than** forty-five (45) days after the completion of the testing. An extension may be granted by IDEM-OAMQ and HDEM if the source submits to IDEM-OAMQ, a reasonable written explanation **within not later than** five (5) days prior to the end of the initial forty-five (45) day period.

5. C.12 (Compliance Monitoring) there are times when compliance monitoring is required by a MACT that the source does not have to comply with yet. Therefore, language has been added to clarify that the permit will specify when CM doesn't have to start in 90 days. The same idea applies to new units, if the MACT doesn't apply yet, we would not expect the source to start compliance monitoring.

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond

its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a ~~permit revision~~ **source modification** shall be implemented when operation begins.

6. C.13 (Monitoring Methods) the following rule cites have been added.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing ~~performed~~ required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60, Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

7. C.14 (Pressure Gauge Specifications) rule cites have been added. Language has been added for other instrument specifications.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) 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.
- (b) **Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument 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.**
- (c) **The Permittee may request the IDEM, OAMQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring**

the measurement of pressure drop or other parameters.

8. C.15 (Risk Management Plan) if a source is subject to 40 CFR 68, they should have already submitted a Risk Management Plan.

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a);~~ or
- (b) As a part of the annual 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
- ~~(c) A verification to IDEM-OAM and HDEM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.~~

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

9. C.16 (Compliance Monitoring Plan - Failure to Take Response Steps) little grammatical changes were made upon a few reviewers request. (a) "of" was added. (c) "or" has been replaced with a period. (f) "(5%)" has been added to be consistent with the rest of the permit. Also, changes were made to (a)(5) and (f) due to frequently asked questions.

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (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-OAMQ and HDEM upon request and shall be subject to review and approval by IDEM-OAMQ or HDEM. 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) Reasonable response steps that may 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 reasonable 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, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps ~~shall~~ **may** constitute a violation of the permit.
 - (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. 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. ~~;~~
 - (3) An automatic measurement was taken when the process was not operating. ~~;~~
 - (4) The process has already returned or is returning 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.
 - (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
 - (f) ~~If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.~~
 - (4) At its discretion, IDEM may excuse ~~such the Permittee's failure to perform the monitoring and recordkeeping as required by Section D, providing adequate~~ **if the Permittee provides adequate** justification ~~is documented~~ and **documents that** such failures do not exceed five percent (**5%**) of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.
10. C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test) “corrective actions” has been changed to “response actions” to be consistent with the rest of the permit.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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~~ **response** actions. The Permittee shall submit a description of these ~~corrective~~ **response** actions to IDEM-OAMQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the ~~corrective~~ **response** actions are being implemented.
- (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-OAMQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM-OAMQ may extend the retesting deadline.
- (c) IDEM-OAMQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- 11. C.19 (General Record Keeping Requirements) "monitoring" was removed so that the condition will seem more generalized to all record keeping, "reports" was added to clarify that the source must keep copies of those as well. (b) and (c) have been removed because they were unnecessary. If we wanted records of those things, we would specify it in D or elsewhere in the permit.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required ~~monitoring~~ data, **reports**, 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM 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.~~

~~(d)~~**(b) Unless otherwise specified in this permit**, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

12. C.20 (General Reporting Requirements) the Semi-Annual Compliance Monitoring Report is now the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report has been removed, all the information is in B.14. In (d) we have clarified that the report does need to be certified by the responsible official, this change is also reflected in all the D sections and the reporting forms. EPA has also requested this change.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit a **the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent**. Any deviation from the **permit** requirements, and the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period**. The **Quarterly Deviation and Compliance Monitoring Report** shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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~~ **Quality**
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

(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-OAMQ and HDEM on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does ~~not~~ require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(e) All instances of deviations as described in Section B Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (f) ~~Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- (g)(e) 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. Reporting periods are based on calendar years.

Section D

1. D.1.6 (Volatile Organic Compounds (VOC)) the last sentence has been removed, it is unnecessary since we have C.11 Compliance Requirements. In the last model we took out the no testing required condition, so it makes sense to get rid of this sentence for consistency.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 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 HDEM reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

- (a) The permittee shall use only the coatings for which the above information has been submitted to and approved by IDEM, OAM~~Q~~ or HDEM.
- (b) Use of the two (2) paint booths, Booth 1 or Booth 2 for any other units, rates, or coatings must be approved by IDEM, OAM~~Q~~ or HDEM.

Forms

- Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the Compliance Branch, not the Compliance Data Section. We have negotiated with EPA on the reporting of emergencies. They agree to allow the 2 day notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official, therefore will comply with the Part 70 requirement to have all reports certified.
- The monthly and quarterly reports and the Natural Gas Fired Boiler Certification will now need to be certified by the responsible official, therefore the last line in each of these reports have been changed from "A certification is not required for this report." to "Attach a signed certification to complete this report".
- The Quarterly or Semi-Annual Compliance Monitoring Report, is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. We are no longer requiring sources to report deviations in ten days, therefore every source will need submit this report quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.
- The necessary changes have been made to the forms to reflect the recent change from Office of Air Management to Office of Air Quality and OAM to OAQ.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: **George O'Day's Shop, Inc.**
Source Address: 19 – 143rd Street, Hammond, Indiana 46327-1313
Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
FESOP No.: **F089-12582-00459**

**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:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- 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 QUALITY
COMPLIANCE DATA SECTION BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320
Phone: 219-853-6306
Fax: 219-853-6343**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: **George O'Day's Shop, Inc.**
Source Address: 19 – 143rd Street, Hammond, Indiana 46327-1313
Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
FESOP No.: **F089-12582-00459**

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
<input type="checkbox"/>	4. This is an emergency as defined in 326 IAC 2-7-1(12) •The Permittee must notify the Office of Air Management Quality (OAMQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and •The Permittee must submit notice in writing by mail or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input type="checkbox"/>	2. This is a deviation, reportable per 326 IAC 2-8-4(3)(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:

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 ? Y N Describe:
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 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:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is **not** required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT QUALITY
 COMPLIANCE DATA SECTION
 and
 HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 -AIR POLLUTION CONTROL DIVISION-**

VOC Compliance Monitoring Form

Source Name: **George O'Day's Shop, Inc.**
 Source Address: 19- 143rd Street, Hammond, Indiana 46327-1313
 Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
 FESOP No.: **F089-12582-00459**
 Limit: **25 Tons per year; 12 month rolling total**

Reporting Month: _____ **Year:** _____

Current Month Emissions			
Coating, Dilution Solvent, or Cleaning Solvent	A (gallons)	B (lbs VOC per gallon)	C (lbs)
Rust Buster		3.23	
308E		8.62	
Cabinets white enamel		2.14	
Mechanisms gray enamel		1.20	
Locker gray enamel		1.41	
New locker beige enamel		1.44	
Glycol Ether		7.53	
Red Line Wash		5.91	
Total for the Month (pounds) (sum of column C)			D =
Total for the Month (tons) (D : 2000)			E =
Previous 11 Months Emissions			
Month 11			
Month 10			
Month 9			
Month 8			
Month 7			
Month 6			
Month 5			
Month 4			
Month 3			
Month 2			
Month 1			
Total Previous 12 Months			
Total for the Previous 12 Months (tons) (Add Current plus 11 previous months)			

Equations: ~~C = VOC emissions per coating (pounds) = A x B~~
~~D = Total VOC emissions for the month (pounds) = sum of column C~~
~~E = Total VOC emissions for the month (tons) = D ÷ 2000~~

Reporting Quarter: _____ Year: _____

Month	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is required for this report.

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

**and
 HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 -AIR POLLUTION CONTROL DIVISION-**

HAPs Compliance Monitoring Form

Source Name: **George O'Day's Shop, Inc.**
 Source Address: 19- 143rd Street, Hammond, Indiana 46327-1313
 Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
 FESOP No.: **F089-12582-00459**
 Limit: **10 Tons per year single HAP; 25 Tons per year combined HAPs;
 12 month rolling total**

Reporting Month: _____ Year: _____

Single HAP – glycol ethers

Current Month Emissions			
Coating, Dilution Solvent, or Cleaning Solvent	A (gallons)	B (pounds per gallon) <u>single HAP glycol ethers</u>	C (lbs)
Rust Buster		3.23	
308E		8.62	
Cabinets white enamel		1.26	
Mechanisms gray enamel		0.75	
Locker gray enamel		0.70	
New locker beige enamel		0.72	
Glycol Ether		7.53	
Total for the Month (pounds) (sum of column C)			D =
Total for the Month (tons) (D ÷ 2000)			E =
Previous 11 Months Emissions			
Month 11			
Month 10			
Month 9			
Month 8			
Month 7			
Month 6			
Month 5			
Month 4			
Month 3			
Month 2			
Month 1			
Total Previous 12 Months			
Total for the Previous 12 Months (tons) (Add Current plus 11 previous months)			

Equations: _____ C = Single HAP (glycol ethers) emissions (lbs) = A x B
 _____ D = Total single HAP emissions for the month (pounds) = sum of column C
 _____ E = Total single HAP emissions for the month (tons) = D ÷ 2000

Combination of all HAPs

Current Month Emissions			
Coating, Dilution Solvent, or Cleaning Solvent	A (gallons)	B (pounds per gallon) other HAPs	C (lbs)
Red Line Wash			
Xylene		1.49	
Toluene		1.08	
Methyl Alcohol		0.83	
Methyl Ethyl Ketone		0.42	
Total for the Month (pounds) (sum of column C)			D =
Total for the Month (tons) (D ÷ 2000)			E =
Total of Combination of all HAPs (E + E from previous page)			F =
Previous 11 Months Emissions			
Month 11			
Month 10			
Month 9			
Month 8			
Month 7			
Month 6			
Month 5			
Month 4			
Month 3			
Month 2			
Month 1			
Total Previous 12 Months			
Total for the Previous 12 Months (tons) (Add Current plus 11 previous months)			

- Equations: C = other HAP emissions (lbs) = A x B
 D = Total other HAP emissions for the month (pounds) = sum of column C
 E = Total other HAP emissions for the month (tons) = D ÷ 2000
 F = Total of all HAP emissions for the month (tons) = E + E from previous page

Reporting Quarter: _____ Year: _____

Month	Single HAP Usage This Month	Single HAP Usage Previous 11 Months	Single HAP Usage 12 Month Total

Reporting Quarter: _____ Year: _____

Month	Total HAPs Usage This Month	Total HAPs Usage Previous 11 Months	Total HAPs Usage 12 Month Total

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT QUALITY
 COMPLIANCE DATA SECTION
 and
 HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 -AIR POLLUTION CONTROL DIVISION-**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: **George O'Day's Shop, Inc.**
 Source Address: 19 – 143rd Street, Hammond, Indiana 46327-1313
 Mailing Address: 526 E. 114th Place, Chicago, Illinois 60628-5104
 FESOP No.: **F089-12582-00459**

Months: _____ to _____ Year: _____

<p>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 based on a calendar year. Any deviation from the compliance monitoring requirements, and the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. 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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

**Indiana Department of Environmental Management
Office of Air Quality
And
Hammond Department of Environmental Management
Air Pollution Control Division**

Technical Support Document (TSD) for a
Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: George O'Day's Shop, Inc.
Source Location: 19 – 143rd Street, Hammond, Indiana
County: Lake
SIC Code: 3479 – Stripping and Repainting Lockers and Towel Cabinets
Operation Permit No.: F089-12582-00459
Permit Reviewer: Ronald Holder

The Hammond Department of Environmental Management (HDEM) has reviewed a New Source FESOP application from George O'Day's Shop, Inc. relating to the construction and operation of a facility for the Stripping and Repainting of Lockers and Towel Cabinets.

This new source will consist of the following process:

Stripping and Repainting Lockers and Towel Cabinets

Caustic Stripping and Rust Stop Application Station

(General Vent)

This step in the process consists of caustic stripping and the application of a rust inhibitor. A maximum design rate of 10.6 towel cabinets per hour will be prepared here for painting in the next step "Booth 1".

There are no emission controls associated with this step. A small amount of VOC is emitted and exhausts through their general vent (Gen Vent).

Recording of VOC and HAP use at this step will be required as part of the total VOC and HAP reporting requirements for determining compliance with their FESOP limitations.

EU-01: Spray Booth for Cabinets "Booth 1"

(S-1 and S-2)

This step in the process consists of a Devilbiss spray paint booth known as "Booth 1". A maximum rate of 12.5 towel cabinets per hour or 40 interior mechanisms per hour can be painted at this point.

There are no emission controls for VOCs at this booth, however, there are panel filters (CE-1) for 90% control of paint particulates prior to exhaust at this stack (S-1). An electric drying oven follows this booth and exhausts with no controls through stack (S-2). All VOC emissions are accounted for at stack (S-1) where the coatings are applied.

Recording of VOC and HAP use at this step will be required as part of the total VOC and HAP reporting requirements for determining compliance with their FESOP limitations.

EU-02: Spray Booth for Lockers “Booth 2”

(S-3)

This step in the process consists of a TBI-Team Blowtherm spray paint booth known as “Booth 2”. A maximum rate of 6.25 lockers per hour can be painted at this point.

There are no emission controls for VOCs at this booth, however, there are panel filters (CE-2) for 90% control of paint particulates prior to exhaust at this stack (S-3).

Recording of VOC and HAP use at this step will be required as part of the total VOC and HAP reporting requirements for determining compliance with their FESOP limitations.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

1. 326 IAC 2-7-1 (21)(G)(I)(AA) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - a) Space Heaters: 20 @ 0.085 MMBtu/hr
 - b) Space Heaters: 10 @ 0.200 MMBtu/hr; total 3.7 MMBtu/hr.
2. 326 IAC 2-7-1 (21)(G)(x)(AA) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment:
 - a) Panel Filters for PM control CE-1 changed as needed.
 - b) Panel Filters for PM control CE-2 changed as needed.

Existing Approvals

There are no existing approvals or permitted items at the location of this new source.

Enforcement Issue

There are no enforcement actions pending for this new source.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 administratively complete FESOP application for the purposes of this review was received on June 2, 2000. Additional information was received on July 31, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (four (4) pages).

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.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM-10	42.95
SO ₂	0.01
VOC	28.38
CO	00.64
NO _x	01.49

HAP's	Potential To Emit (tons/year)
Glycol ethers	12.97
Others	3.61
TOTAL	16.58

(see calculations Appendix A)

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) is equal to or greater than twenty-five (25) tons per year in Lake County. Therefore, this new source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single hazardous air pollutant (HAP) is equal to or greater than ten (10) tons per year. Therefore, this new source is subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and HAP shall be limited by a Federally Enforceable State Operating Permit (FESOP). Therefore, the source will not be subject to 326 IAC 2-3, Emission Offset and 326 IAC 2-7, Part 70 Permit Program.

Actual Emissions

Since no actual emissions are available from a new source, this information reflects the potential after control including the limitations requested by the source in their FESOP application.

A source with “potential to emit” high enough to make it a “major source” but whose actual emissions are below the Part 70 emission levels may elect to avoid the Part 70 Operating Permit Program by agreeing to accept a permit with federally enforceable limits that restrict its PTE to below the major source emission levels. The permit containing these restrictions is called a Federally Enforceable State Operating Permit (FESOP).

Pollutant	Actual Emissions (tons/year)
PM-10	4.30
SO ₂	0.01
VOC	< 25
CO	0.64
NO _x	1.49
Single HAP	< 10
Combination HAPs	16.58 (< 25)

(see calculations Appendix A)

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Combination HAPs
Stripping & Repainting Lockers & Towel Cabinets	4.30	N/A	24	N/A	N/A	9	16.58
Total Emissions	4.30	---	24	---	---	9	16.58

County Attainment Status

This source is located in Lake County.

40 CFR 81.315 – (Indiana) – 7/1/99

Pollutant	Status
PM-10	Moderate Non-attainment
SO ₂	Primary Non-attainment
NO ₂	Unclassifiable / Attainment*
Ozone	Severe Non-attainment
CO	Unclassifiable / Attainment
Lead	Attainment

*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. Lake County has been designated as severe non-attainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Lake County has been classified as moderate non-attainment for particulates less than ten (10) microns in diameter (PM₁₀). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Federal Rule Applicability

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to any facility at this new source.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to any facility at this new source.

State Rule Applicability - Entire Source

326 IAC 2-3 (Emission Offset)

Input of volatile organic compounds (VOC) to this process shall be limited to twenty-five (25) tons per year; therefore the requirements of the Emission Offset rule, 326 IAC 2-3, will not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)(HAPs)

Input of hazardous air pollutants (HAPs) to this process shall be limited to ten (10) tons per year of any single HAP and twenty-five (25) tons per year of any combination of HAPs; therefore, the requirements of 326 IAC 2-4.1 will not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Lake County. Pursuant to this rule, the owner/operator of the source must annually submit a certified emission statement for the source according to the requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1 (Visible 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 not exceed an average 20% during any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

State Rule Applicability - Individual Facilities

326 IAC 8-2-9 (Miscellaneous Metal Coating) Spray Booths VOCs

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to a coating applicator in a coating application system shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for an air dried or forced warm air dried system.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS and calculations submitted by the source and reviewed by this Department, the spray booths at this source will be in compliance with this requirement.

326 IAC 2-1.1-10 (Local Agencies) Spray Booths Particulates

Pursuant to 326 IAC 2-1.1-10 (b), a local agency may set an emission limitation provided it does not conflict with the attainment or maintenance of an ambient air quality standard or does not assure compliance with an applicable requirement. The Hammond Department of Environmental Management chooses a "technology-based emission limit" as defined in 326 2-7-1 (39). This limitation is based on the source's physical potential to emit after controls as certified in their permit application. This limitation is more stringent than the minimum standards found in Title 326 of the Indiana Administrative Code.

The source will comply with the limitation by maintaining the control equipment as specified by the manufacturer, daily visual observations, daily pressure drop readings, and the record keeping or reporting necessary to demonstrate compliance with the requirements.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM-OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The spray paint booths known as Booth 1 and Booth 2 and their associated dry particulate filters CE-1 and CE-2 have applicable compliance monitoring conditions as specified below:

Weekly visible emissions notations of the paint booth exhaust points S-1 and S-3 shall be performed during normal daylight operations while the booths are in operation. 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 Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

The dry particulate filters CE-1 and CE-2 shall be inspected daily. A trained employee will record whether the filters are in good working condition or not. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when abnormal conditions are observed.

These monitoring conditions are necessary because the particulate emissions limitations are based on the control efficiency stated in the source's FESOP application.

2. The spray paint booths known as Booth 1 and Booth 2 have applicable compliance monitoring conditions as specified below:

Monthly records of the following process parameters shall be maintained to demonstrate compliance with the FESOP limitation of twenty-five (25) tons per year of volatile organic compounds (VOC), ten (10) tons per year for a single hazardous air pollutant (HAP), and twenty-five (25) for any combination of HAPs:

- a) Total quantity of coatings applied in gallons.
- b) Total quantity of clean-up solvents used in gallons.

These records will be submitted to HDEM and IDEM-OAQ, Compliance Section on a quarterly basis on forms provided to demonstrate a twelve (12) month rolling total.

These monitoring conditions are necessary to ensure compliance with the requirements of 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 1990 Clean Air Act. 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 Quality (OAQ) FESOP Application Form GSD-08.

This source has accepted and applied for federally enforceable air toxic emission limits of ten (10) tons per year for any single HAP and twenty-five (25) tons per year for any combination of HAPs.

Conclusion

The operation of this **Locker and Towel Cabinet Stripping and Repainting Facility** shall be subject to the conditions of the attached proposed **FESOP No. F089-12582-00459**.

Step 1 Cabinets & Inside Mechanisms (General Vent)

stripping

Coating	units/hr	gals/unit	lbs VOC/gal	lbs VOC/hr	TPY	Worst Case
Rust Buster	10.6	0.0049	3.23	0.168	0.735	<u>0.735</u>
308E	10.6	0.001	8.62	0.091	0.400	<u>0.400</u>

Step 2 Cabinets & Inside Mechanisms (Booth 1) (S-1)

painting

Coating	units/hr	gals/unit	lbs VOC/gal	lbs VOC/hr	TPY	Worst Case
Cabinets-white enamel	12.5	0.064	2.14	1.712	7.499	MDR is 12.5 Cabinets or 40 inside mechanisms, not both, so worst case is: <u>7.499</u>
Mechanisms-gray enamel	40	0.013	1.2	0.624	2.733	

Step 3 Drying Oven (S-2)

drying

Drying Oven (0.123 MMBtu/hr) is electric. VOCs from drying are accounted for above at stack (S-1) where coating is applied.

Step 4 Lockers (Booth 2) (S-3)

painting

Coating	units/hr	gals/unit	lbs VOC/gal	lbs VOC/hr	TPY	Worst Case
Locker-gray enamel	6.25	0.342	1.41	3.014	13.201	MDR is 6.25 lockers/hr with either gray or beige, not both, so worst case is: <u>13.482</u>
New Locker- beige enamel	6.25	0.342	1.44	3.078	13.482	

Step 5 Clean-up (General Vent)

Coating	units/hr	gals/unit	lbs VOC/gal	lbs VOC/hr	TPY	Worst Case
Glycol Ether	18.75	0.0011	7.53	0.155	0.680	<u>0.68</u>
Red Line Wash	18.75	0.0115	5.91	1.274	5.582	<u>5.582</u>

PTE	VOC	28.38	TPY
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HAP Emissions

single worst HAP

Glycol Ethers

Step 1 Cabinets & Inside Mechanisms (General Vent)

stripping

Coating	Units/hr	gals/unit	density lbs/gal	weight % HAP	lbs HAP/hr	TPY
Rust Buster	10.6	0.0049	12.91	25.0%	0.168	0.734
308E	10.6	0.001	9.58	90.0%	0.091	0.400

Worst Case

0.734
0.400

Step 2 Cabinets & Inside Mechanisms (Booth 1) (S-1)

painting

Cabinets-white enamel	12.5	0.064	10.92	11.5%	1.006	4.408
Mechanisms-gray enamel	40	0.013	9.57	7.8%	0.387	1.696

MDR is 12.5 Cabinets or 40 inside mechanisms, not both, so worst case is:

4.408

Step 3 Drying Oven (S-2)

drying

Drying Oven (0.123 MMBtu/hr) is electric. VOCs from drying are accounted for above at stack (S-1) where coating is applied.

Step 4 Lockers (Booth 2) (S-3)

painting

Locker-gray enamel	6.25	0.342	9.49	7.4%	1.499	6.566
New Locker- beige enamel	6.25	0.342	9.75	7.4%	1.540	6.746

MDR is 6.25 lockers/hr with either gray or beige, not both, so worst case is:

6.746

Step 5 Clean-up (General Vent)

Glycol Ether	18.75	0.0011	7.53	100.0%	0.155	0.680
Red Line Wash	18.75	0.0115	8.33	0.0%	0.000	0.000

0.68
0

glycol ether

PTE - single HAP	12.97	TPY
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George O'Day's Shop, Inc.

Stripping & Repainting Lockers and Towel Cabinets

Appendix A

HAP Emissions

total HAPs

(based on 8760 hours)

HAP	Coating	Units/hr	gals/unit	density lbs/gal	weight % HAP	lbs HAP/hr	TPY	Worst Case
Xylene	Red Line Wash	18.75	0.0115	8.33	17.9%	0.322	1.408	<u>1.408</u>
Toluene	Red Line Wash	18.75	0.0115	8.33	13.0%	0.234	1.023	<u>1.020</u>
Methyl Alcohol	Red Line Wash	18.75	0.0115	8.33	10.0%	0.180	0.787	<u>0.787</u>
Methyl Ethyl Ketone	Red Line Wash	18.75	0.0115	8.33	5.0%	0.090	0.393	<u>0.393</u>
						PTE - other HAPs		<u>3.61</u>
						PTE - glycol ether from previous page		<u>12.97</u>

PTE - total HAPs 16.58 TPY

George O'Day's Shop, Inc.

Stripping & Repainting Lockers and Towel Cabinets

Appendix A

Particulate Emissions

(based on 8760 hours)

Paint Solids (1-wgt% total VOC)
 Air Atomization transfer efficiency (TE) (25%)
 Dry (Panel) Filters Overspray Control (90%)

Step 1 Cabinets & Inside Mechanisms (General Vent)
 stripping

Coating	lbs/gal	wtg %	units/hr	gals/unit	transfer efficiency	particulates before control		Worst Case (PTE)
		total VOC				lbs/hr	TPY	
$PM \text{ lbs/hr} = (\text{lbs/gal}) \times (1 - \text{w\%VOC}) \times (\text{units/hr}) \times (\text{gals/unit}) \times (1 - \text{TE})$								
Rust Buster	12.91	60%	10.6	0.0049	25%	0.201	0.881	<u>0.881</u>
308E	9.58	90%	10.6	0.001	25%	0.008	0.033	<u>0.033</u>

Step 2 Cabinets & Inside Mechanisms (Booth 1) (S-1)
 painting

Cabinets-white enamel	10.92	47.20%	12.5	0.064	25%	3.459	15.152	MDR is 12.5 Cabinets or 40 inside mechanisms, not both, so worst case is: <u>15.152</u>
Mechanisms-gray enamel	9.57	66.90%	40	0.013	25%	1.235	5.411	

Step 3 Drying Oven (S-2)
 drying

Drying Oven (0.123 MMBtu/hr) is electric.
 Particulates are accounted for at the previous step, stack (S-1) where coating is applied.

Step 4 Lockers (Booth 2) (S-3)
 painting

Locker-gray enamel	9.49	63.27%	6.25	0.342	25%	5.588	24.475	MDR is 6.25 lockers/hr with either gray or beige, not both, so worst case is: <u>26.885</u>
New Locker- beige enamel	9.75	60.73%	6.25	0.342	25%	6.138	26.885	

Step 5 Clean-up (General Vent)

Glycol Ether
 Red Line Wash
 Clean-up materials are 100% volatile - no particulates

Air Atomization transfer efficiency (TE) (25%)
 Dry (Panel) Filters Overspray Control (90%)

Particulates		
PTE Before Controls	<u>42.95</u>	TPY
PTE After Controls (90% CE)	<u>4.30</u>	TPY

All particulates will be considered PM10
 unless shown by the company to be otherwise

$$\text{PM lbs/hr} = (\text{lbs/gal}) \times (1 - \text{w\%VOC}) \times (\text{units/hr}) \times (\text{gals/unit}) \times (1 - \text{TE})$$