April 20, 2001

Mr. Randy Engler
Schwab Corporation
P. O. Box 5088
Lafayette, Indiana 47903

Re: 123-14052
Second Administrative Amendment to
Part 70 123-7304-00018

Dear Mr. Engler:

Schwab Corporation was issued a permit on May 5, 1998 for the manufacture of metal office products. A letter requesting an amendment was received on March 12, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

(a) The installation of one (1) 1.7 million British Thermal Units (mmBtu/hr) natural gas-fired

catalytic infra-red furnace;

(b) The removal of the one (1) sheet metal spray booth, identified as SB, permitted in the Part 70 permit;

(c) The removal of the following insignificant activities that do not have applicable requirements that were not specifically listed in the Part 70.

(1) One (1) natural gas-fired, paint baking oven of 2,600,000 BTU input will be removed and its roof vents capped.
(2) One (1) natural gas-fired, parts drying oven of approx. 1,600,000 BTU will be removed and its roof vents capped.
(3) One (1) parts washing system with its water heating burners of approximately 1,200,000 BTU input will be removed and its associated vents capped.
(4) One (1) electric bulb fired, file paint baking oven of approximately 375 kilowatts. This will be removed and be replaced by one (1) 1.7 million British Thermal Units (mmBtu/hr) natural gas-fired catalytic infra-red furnace.

1. Section A.2, Emission Units and Pollution Control Equipment Summary is modified as follows (changes are bolded and deletions are struck-through for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);

~~(2) One (1) sheet metal spray booth, identified as SB, with a maximum capacity of seventy-five (75) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-3)~~;

(~~3~~ **2**) One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);

(~~4~~ **3**) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;

(~~5~~ **4**) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and

(~~6~~ **5**) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

2. Section D.1 facility description table has been modified to reflect the removal of parts paint booth “SB”, as follows:

(1)	One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);
~~(2)~~	~~One (1) sheet metal spray booth, identified as SB, with a maximum capacity of seventy-five (75) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-3)~~;
(~~3~~ **2**)	One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);
(~~4~~ **3**)	One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;
(~~5~~ **4**)	One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and
(~~6~~ **5**)	TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

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

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

(a) Any change or modification to ~~the two (2)~~ spray booth~~s ~~ (FB~~, and SB~~) or the one (1) mixer (MX) must be approved by the Office of Air **Quality** ~~Management~~ (OA~~M~~ **Q)** before such change or modification can occur.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements):

(1) The one (1) complete safe painting spray booth (PB) shall not cause, allow or permit the discharge into the atmosphere of any Volatile Organic Compound (VOC) in excess of 3.5 pounds per gallons of coating excluding water for air dried coatings.

(2) Solvent sprayed from application equipment of the one (1) complete safe painting spray booth (PB), during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.1a No change

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the one (1) spray booth (FB~~, the one (1) spray booth (SB~~), the one (1) complete safe painting spray booth (PB), the one (1) mixer for dry and wet insulation (fire proofing) ingredients, the one (1) patch (grinding) booth (GB), and the TIG and MIG welding stations shall not exceed the pound per hour emission rate as established as E in the following formula:

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

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

D.1.3 No change

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

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

(a) The water wash wall for PM control shall be in operation at all times when the ~~three (3)~~ **two (2)** paint booths (FB, ~~SB~~ and PB) are in operation.

(b) The dry filters for PM control shall be in operation at all times when the one (1) patch (grinding) booth is in operation.

D.1.5 Visible Emissions Notations

(a) Daily visible emission notations of the ~~three (3)~~ **two (2)** spray booths (FB, ~~SB~~ and PB), one (1) patch grinding booth (GB), one (1) mixer (MX), and the TIG and MIG

welding stations (Weld) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Monitoring

(a) Weekly 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 an overspray emission, evidence of overspray emission, or other abnormal 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.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.2 and D.1.6, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the **two (2)** ~~three (3)~~ spray booths (FB, ~~SB~~ and PB), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust.

(c) To document compliance with Condition D.1.1(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish

compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and 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) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

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

PART 70 OPERATING PERMIT
Office of Air Quality

Schwab Corporation
Route 66 East
Cannelton, Indiana 47530

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T123-7304-00018	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: May 5, 1998

First Minor Modification MMT 123-9837 Issuance Date: January 19, 1999
First Administrative Amendment 123-10301 Issuance Date: March 22, 1999

2nd Administrative Amendment: 123-14052	Pages Affected: 4, 27, 28, 29
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: April 20, 2001

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 presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal office products manufacturing operation

Responsible Official:	Randy Engler
Source Address:	Route 66 East, Cannelton, Indiana 47530
Mailing Address:	P.O. Box 5088, Lafayette, Indiana 47903-5088
SIC Code:	3499
County Location:	Perry
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);

(2) One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);

(3) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;

(4) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and

(5) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

SECTION D.1 FACILITY OPERATION CONDITIONS

(1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);

(2) One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);

(3) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;

(4) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and

(5) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

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

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

(a) Any change or modification to spray booth (FB) or the one (1) mixer (MX) must be approved by the Office of Air Quality (OAQ) before such change or modification can occur.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements):

(1) The one (1) complete safe painting spray booth (PB) shall not cause, allow or permit the discharge into the atmosphere of any Volatile Organic Compound (VOC) in excess of 3.5 pounds per gallons of coating excluding water for air dried coatings.

(2) Solvent sprayed from application equipment of the one (1) complete safe painting spray booth (PB), during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.1a Volatile Organic Compound (VOC) [326 IAC 2-2]

The use of the one (1) post office spray booth (POB) shall be permanently discontinued. Any change or modification that would require the use of the one (1) post office spray booth (POB) shall trigger applicability to 326 IAC 2-2 (Prevention of Significant Deterioration) and must be approved by the Office of Air Quality before such change or modification can occur.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the one (1) spray booth (FB), the one (1) complete safe painting spray booth (PB), the one (1) mixer for dry and wet insulation (fire proofing) ingredients, the one (1) patch (grinding) booth (GB), the one (1) glass shot blast for cleaning, and the TIG and MIG welding stations shall not exceed the pound per hour emission rate as established as E in the following formula:

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

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

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) or particulate matter (PM) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

(a) The water wash wall for PM control shall be in operation at all times when the two (2) paint booths (FB and PB) are in operation.

(b) The dry filters for PM control shall be in operation at all times when the one (1) patch (grinding) booth is in operation.

D.1.5 Visible Emissions Notations

(a) Daily visible emission notations of the two (2) spray booths (FB, and PB), one (1) patch grinding booth (GB), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Monitoring

(a) Weekly 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 an overspray emission, evidence of overspray emission, or other abnormal 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.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.2 and D.1.6, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the two (2) spray booths (FB, and PB), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust.

(c) To document compliance with Condition D.1.1(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and 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) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to Part 70 Permit

Source Background and Description

Source Name:	Schwab Corporation	
Source Location:	Route 66 East, Cannelton, Indiana 47530	
County:	Perry	
SIC Code:	3499	
Operation Permit No.:	T123-7304-00018	Issuance Date: May 5, 1998
2nd Administrative Amendment No.:	123-14052	
Permit Reviewer:	Aida De Guzman	

The Office of Air Quality (OAQ) has reviewed an Administrative Amendment application from Schwab Corporation relating to the following changes in the plant that manufactures metal office products:

(a) The installation of one (1) 1.7 million British Thermal Units (mmBtu/hr) natural gas-fired catalytic infra-red furnace;

(b) The removal of the one (1) sheet metal spray booth, identified as SB, permitted in the Part 70 permit;

(c) The removal of the following insignificant activities that do not have applicable requirements that were not specifically listed in the Part 70.

(1) One (1) natural gas-fired, paint baking oven of 2,600,000 BTU input will be removed and its roof vents capped.
(2) One (1) natural gas-fired, parts drying oven of approx. 1,600,000 BTU will be removed and its roof vents capped.
(3) One (1) parts washing system with its water heating burners of approximately 1,200,000 BTU input will be removed and its associated vents capped.
(4) One (1) electric bulb fired, file paint baking oven of approximately 375 kilowatts. This will be removed and be replaced by one (1) 1.7 million British Thermal Units (mmBtu/hr) natural gas-fired catalytic infra-red furnace.

History

On March 12, 2001, Schwab Corporation has submitted an application to the Office of Air Quality (OAQ) requesting to amend the existing Part 70 permit, T123-7304-00018 issued on May 5, 1998.

Existing Approvals

The source was issued a Part 70 Operating Permit T123-7304-00018 issued on May 5, 1998. The source has since received the following:

(a) First Minor Permit Modification No.: 123-9837 issued on January 19, 1999.

(b) First Administrative Amendment No.: 123-10301, issued on March 22, 1999.

Recommendation

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

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

An application for the purposes of this review was received on March 12, 2001.Additional information was received via e-mail March 23, 2001.

Emission Calculations

(a) Natural Gas-Fired Catalytic Infra-Red Furnace Emissions: See Page 1 of 1 TSD Appendix A of this document for detailed emissions calculations.

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."

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.1
SO_2	0.0
VOC	0.0
CO	0.6
NO_x	0.7

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

Justification for the Level of Approval

In addition to the installation of a natural gas-fired furnace which is an insignificant activity as shown in the above emissions, the application involves the removal of parts paint booth "SB" which will constitute a revision to descriptive information of the Part 70 Permit where the revision will not trigger a new applicable requirements. Therefore, the Part 70 Operating permit is being modified through an Administrative Amendment, 326 IAC 2-7-11.

Potential to Emit

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

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Natural gas infra-red furnace	0.0	0.1	0.0	0.0	0.6	0.7	0.0
Total Emissions	0.0	0.1	0.0	0.0	0.6	0.7	0.0

County Attainment Status

The source is located in Perry County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	not determined

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) 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. Perry County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

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

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

State Rule Applicability - Entire Source

(a) 326 IAC 2-6 (Emission Reporting)
This source was already determined in the Part 70 permit to be subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 100 tons per year for PM10, and VOC.

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

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

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of

fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

(a) 326 IAC 6-2 (PM Emissions Limit for Sources of Indirect Heating)
The natural gas-fired infra-red furnace is not subject to 326 IAC 6-2, because it is not a source of indirect heating.

Changes to the Part 70 Permit

1. Section A.2, Emission Units and Pollution Control Equipment Summary is modified as follows (changes are bolded and deletions are struck-through for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);

~~(2) One (1) sheet metal spray booth, identified as SB, with a maximum capacity of seventy-five (75) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-3)~~;

(~~3~~ **2**) One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);

(~~4~~ **3**) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;

(~~5~~ **4**) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and

(~~6~~ **5**) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

2. Section D.1 facility description table has been modified to reflect the removal of parts paint booth "SB", as follows:

(1)	One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);
~~(2)~~	~~One (1) sheet metal spray booth, identified as SB, with a maximum capacity of seventy-five (75) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-3)~~;
(~~3~~ **2**)	One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);
(~~4~~ **3**)	One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;
(~~5~~ **4**)	One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and
(~~6~~ **5**)	TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

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

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

(a) Any change or modification to ~~the two (2)~~ spray booth~~s (FB, and SB~~) or the one (1) mixer (MX) must be approved by the Office of Air **Quality** ~~Management~~ (OA~~M~~ **Q)** before such change or modification can occur.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements):

(1) The one (1) complete safe painting spray booth (PB) shall not cause, allow or permit the discharge into the atmosphere of any Volatile Organic Compound (VOC) in excess of 3.5 pounds per gallons of coating excluding water for air dried coatings.

(2) Solvent sprayed from application equipment of the one (1) complete safe painting spray booth (PB), during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.1a No change

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the one (1) spray booth (FB~~), the one (1) spray booth (SB~~), the one (1) complete safe painting spray booth (PB), the one (1) mixer for dry and wet insulation (fire proofing) ingredients, the one (1) patch (grinding) booth (GB), and the TIG and MIG welding stations shall not exceed the pound per hour emission rate as established as E in the following formula:

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

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

D.1.3 No change

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

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

(a) The water wash wall for PM control shall be in operation at all times when the ~~three (3)~~ **two (2)** paint booths (FB, ~~SB~~ and PB) are in operation.

(b) The dry filters for PM control shall be in operation at all times when the one (1) patch (grinding) booth is in operation.

D.1.5 Visible Emissions Notations

(a) Daily visible emission notations of the ~~three (3)~~ **two (2)** spray booths (FB, ~~SB~~ and PB), one (1) patch grinding booth (GB), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Monitoring

(a) Weekly 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 an overspray emission, evidence of overspray emission, or other abnormal 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.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.2 and D.1.6, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the **two (2)** ~~three (3)~~ spray booths (FB, ~~SB~~ and PB), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust.

(c) To document compliance with Condition D.1.1(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and 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) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Compliance Requirements

Permits issued under 326 IAC 2-7are 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 2-7-5. 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.

Conclusion

This permit amendment shall be subject to the conditions of the attached **Administrative Amendment 123-14502-00018.**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

catalytic infra-red furnace

Company Name: Schwab Corp.
Address City IN Zip: Route 66 East, Cannelton, Indiana 47530
Administrative Amedment No.: 123-14052-00018
Reviewer: Aida De Guzman
Date: March 23, 2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.7	14.9

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	0.7	0.0	0.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).