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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal OFFICE OF AIR QUALITY

**Valmont Industries, Inc.
58027 Charlotte Avenue
Elkhart, Indiana 46517**

(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.: F039-14186-00237	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 3, 2002 Expiration Date: April 3, 2007

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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). 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 fabricated metal products facility which manufactures light poles.

Authorized individual:	Franco Garcia, General Manager
Source Address:	58027 Charlotte Avenue, Elkhart, IN 46517
Mailing Address:	58027 Charlotte Avenue, Elkhart, IN 46517
SIC Code:	3499
Source Location Status:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor 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 emission units and pollution control devices:

- (a) One (1) shotblaster, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge type filters identified as CD-03a and CD-03b, vented indoors; and
- (b) Two (2) powder coating booths, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04A has a maximum coating rate of 21.33 pounds per hour and is equipped with three (3) electrostatic applicators only two of which can be used at any one time, exhausting through two (2) cartridge type dust collectors identified as CD-04a and CD-04b and venting back into the system as make up air. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting through one (1) cartridge type dust collector identified as CD-04c and venting back into the system as make up air.

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) One (1) natural gas fired air make-up unit, with a maximum rated capacity of 3.3 million British thermal units per hour;
- (b) One (1) natural gas fired air make-up unit, with a maximum rated capacity of 2.2 million British thermal units per hour;
- (c) One (1) natural gas fired heating unit, with a maximum rated capacity of 3.0 million British thermal units per hour;
- (d) Two (2) natural gas fired bake ovens, each oven with a maximum rated capacity of 3.0 million British thermal units per hour;

- (e) Two (2) air make-up air units, each with a maximum rated capacity of 9.0 mmBtu/hr;
- (f) MIG welding stations;
- (g) Gas metal arc welding;
- (h) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (i) Paved and unpaved roads and parking lots with public access;
- (j) Burn tables;
- (k) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
- (l) Oxyacetylene cutting torches;
- (m) Cutting of metal parts;
- (n) Aluminum wipe down operation;
- (o) Hot aluminum extrusion process with no significant emissions, consisting of a die cleaning process to clean metal dies (this process will use NaOH in the cleaning process and no regulated pollutants will be emitted); and
- (p) One chip collector associated with the new hot aluminum extrusion process with two (2) cold cut saws, and [The hot aluminum extrusion process, addressed in the administrative amendment submitted on June 1, 2000, included a chip collector from an aluminum saw. Particle size testing on the material collected by the chip collector indicates that 0.36% of the material is \leq 100 microns and 0.13% of the material is \leq 10 microns with a PTE of $<$ 5 TPY for both 100 and 10 microns classifying this as an insignificant activity.] one (1) hot cut saw without a chip collector.

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) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.

- (b) All previous registrations and permits are superseded by this permit.

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]

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, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

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

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, within a reasonable time, any information that IDEM, OAQ, 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, 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 IAC 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 may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section 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 an 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. All 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 15 of each year to:

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

- (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, 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, 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 maintain and implement Preventive Maintenance Plans (PMPs), 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.
- (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, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner 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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone 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

Telephone No.: 219-245-4870
Facsimile No.: 219-245-4877

Failure to notify IDEM, OAQ and the Northern Regional Office, 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

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, 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, 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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report 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.
- (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 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, 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, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, 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 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

- (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, on or before the date it is due.

(2) If IDEM, OAQ 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 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, 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

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] [326 IAC 2-8-11.1]

- (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

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, 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 the requirements of 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, 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

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, 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 the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Section A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

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 any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) 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
 - (3) 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) 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 that the source's potential to emit does not exceed the above specified limits.
- (c) 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 forty percent (40%) 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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.

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).

C.6 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.7 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.

C.8 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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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.9 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

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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, 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.10 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.11 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 upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

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.

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 Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (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 as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and 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) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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 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 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner 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.19 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 IAC2-1.1-1(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
- (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, 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) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 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)]:

- (a) One (1) shotblaster, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge type filters identified as CD-03a and CD-03b, vented indoors; and
- (b) Two (2) powder coating booths, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04A has a maximum coating rate of 21.33 pounds per hour and is equipped with three (3) electrostatic applicators, only two of which can be used at any one time, exhausting through two (2) cartridge type dust collectors identified as CD-04a and CD-04b and venting back into the system as makeup air. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting through one (1) cartridge type dust collector identified as CD-04c and venting back into the system as make up air.

(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 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter from the one (1) shotblaster, identified as EU-03 shall be limited to 13.83 pounds per hour, based on a process weight rate of 108 tons of steel shot per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter from the two (2) powder coating booths, identified as EU-04A and EU-04B shall be limited by the following:

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:

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

D.1.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 from the one (1) shotblaster, identified as EU-03 shall be limited to 7.43 pounds per hour, which is equivalent to 32.55 tons of PM10 per year.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and its control device.

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

D.1.4 Particulate Matter (PM)

- (a) In order to comply with D.1.1(a), the cartridge filters for PM control shall be in operation at all times when the one (1) shotblaster, identified as EU-03 is in operation.
- (b) In order to comply with D.1.1(b), the cartridge type dust collectors shall be in operation at all times when the two (2) powder coating booths, identified as EU-04A and EU-04B are in operation.

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across each cartridge filter unit, CD-03a and CD-03b controlling the one (1) shotblaster (EU-03) when the one (1) shotblaster (EU-03) is in operation and venting to the atmosphere. When for any one reading, the pressure drop across cartridge filter unit CD-03a is outside the normal range of 2.0 to 8.0 inches of water or a range established during the latest stack test and the pressure drop across filter unit CD-03b is outside the normal range of 0.5 and 2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.1.6 Broken or Failed Cartridge Filter Detection

In the event that cartridge filter failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment cartridge filters, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.7 Cartridge Filter Inspections

An inspection shall be performed each calendar quarter of all cartridge filters controlling the one (1) shotblaster (EU-03) when venting to the atmosphere. A cartridge filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridge filters shall be replaced.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain the following:
 - (1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and

- (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
 - (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.
 - (c) 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**

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

Source Name: Valmont Industries, Inc.
Source Address: 58027 Charlotte Avenue, Elkhart, IN 46517
Mailing Address: 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP No.: F039-14186-00237

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Valmont Industries, Inc.
Source Address: 58027 Charlotte Avenue, Elkhart, IN 46517
Mailing Address: 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP No.: F039-14186-00237

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
 CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 CThe 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? 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:
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**

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

Source Name: Valmont Industries, Inc.
 Source Address: 58027 Charlotte Avenue, Elkhart, IN 46517
 Mailing Address: 58027 Charlotte Avenue, Elkhart, IN 46517
 FESOP No.: F039-14186-00237

Months: _____ **to** _____ **Year:** _____

<p>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".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
<p>Permit Requirement (specify permit condition #)</p>	
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

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name:	Valmont Industries, Inc.
Source Location:	58027 Charlotte Avenue, Elkhart, IN 46517
County:	Elkhart
Operation Permit No.:	F039-14186-00237
SIC Code:	3499
Permit Reviewer:	NH/EVP

On November 14, 2001, the Office of Air Quality (OAQ) had a notice published in the Truth, Elkhart, Indiana, stating that Valmont Industries, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a fabricated metal products facility which manufactures light poles. The notice also stated that OAQ 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.

Upon further review, the OAQ has decided to make the following revisions to the permit:

1. D.1.8 (Parametric Monitoring) requires the permittee to "record the total static pressure drop across each cartridge filter unit and HEPA filter controlling the one (1) shotblaster (EU-02) when the one (1) shotblaster (EU-02) is in operation." The facility description of EU-02 in section D.1 does not mention a HEPA filter, only cartridge filters. If there is in fact no HEPA filter controlling exhaust from shotblaster EU-02, this language should be deleted from the permit.

Valmont Industries, Inc. has sold the plant located at 57843 Charlotte Avenue. The one (1) shotblaster (EU-02) was included in the sale. Therefore, this comment does not need to be addressed.

2. D.1.8 (Parametric Monitoring) states that for EU-02 "the pressure drop across the HEPA filter shall be maintained within the range of 0.5 and 2.0 inches of water or a range established during the latest stack test." The facility description of EU-02 in section D.1 does not mention a HEPA filter, only cartridge filters. If there is in fact no HEPA filter controlling exhaust from shotblaster EU-02, this language should be deleted from the permit.

Valmont Industries, Inc. has sold the plant located at 57843 Charlotte Avenue. The one (1) shotblaster (EU-02) was included in the sale. Therefore, this comment does not need to be addressed.

3. Condition A.5 has been replaced with new language.

~~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, 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.~~

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) **All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**
- (1) **incorporated as originally stated,**
 - (2) **revised, or**
 - (3) **deleted**
- by this permit.**
- (b) **All previous registrations and permits are superseded by this permit.**

4. The typographical error in Condition B.10 has been corrected.

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in ~~condition~~ **Section B, Emergency Provisions**.

5. The telephone and facsimile numbers for the Northern Regional Office have been added to Condition B.14.

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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone 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

Telephone No.: 219-245-4870

Facsimile No.: 219-245-4877

Failure to notify IDEM, OAQ and the **Northern Regional Office**, 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

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, 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, 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.

6. EPA made it clear that there can not be a requirement to do something in a permit, then say that it's not a deviation when the source does not do it [see 40 CFR 70.6(a)(6)(i)]. Condition B.15 is revised as follows:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are~~ **A deviation** required to be reported ~~by pursuant to~~ an applicable requirement **that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do not~~ **does** need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** 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.

7. The following rule cite has been added to Condition B.19.

B.19 Operational Flexibility [326 IAC 2-8-15] **[326 IAC 2-8-11.1]**

- (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

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, 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.

8. Condition C.2 has been deleted from the permit.

~~G.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

9. Several conditions were modified by removing language stating that the condition was not federally enforceable. Federal law states that failure to comply with any permit condition issued under a program that has been approved into a State Implementation Plan (SIP) is to be treated as a violation of the SIP (40 CFR 52.23). This has the effect of making all FESOP conditions federally enforceable. Indiana's FESOP program was approved as a part of Indiana's SIP at 40 CFR 52.788. Neither the program nor the underlying rule, 326 IAC 2-8 contains provisions for designating certain conditions as not federally enforceable.

C.43 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.54 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.65 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.87 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.~~

10. Condition C.9 has been revised so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official.

C.98 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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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.

11. Condition C.18 (now re-numbered C.16) has been revised to re-organize the condition and clarify it's intent.

C.186 Compliance Monitoring ~~Response Plan - Failure to Take Response Steps~~ Preparation, Implementation, Records, and Reports [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~~ **prepare a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. ~~A~~ CRP's shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ.~~ The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee ~~and,~~ **supplemented from time to time by the Permittee**, maintained on site, and is comprised of:
- (A1) 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~~ **an expected timeframe** for taking reasonable response steps including.
- (2) ~~If, a schedule for devising additional~~ **at any time, the Permittee takes reasonable** response steps for situations that ~~may not have been predicted~~ **are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (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 as follows:~~
- (1) **Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
 - (2) **If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
 - (3) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
 - (4) **Failure to take reasonable response steps may shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking~~ **not required to take any** 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 and 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~~ **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- (e) **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC ~~2-7-16~~ **2-8-12** (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (ef) ~~All monitoring~~ **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as** required in Section D shall be performed ~~at all times when 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 record keeping 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.~~

emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

12. Condition C.19 (now re-numbered C.17) now requires a certification by the responsible official for the notification sent in response to non-compliance with a stack test.

C.197 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).

13. The reference to "Compliance Branch" in the heading of the certification form has been deleted.

On December 12, 2001, Robert D. Waugaman of Bruce Carter Associates, L.L.C. (consultant for Valmont Industries, Inc.) submitted comments on behalf of Valmont Industries, Inc. on the proposed FESOP Renewal. The summary of the comments is as follows:

Comment 1

Valmont Industries, Inc. has sold the property at 57843 Charlotte Avenue. Several pieces of equipment presently included in the FESOP for Valmont Industries were either included in or removed with the sale of the property and should be eliminated from the permit. However, some equipment associated with insignificant activities on the FESOP will be moved to the 58027 Charlotte Avenue property.

Plant 1 identified as 57843 Charlotte Avenue has been sold. Any identification and/or reference to Plant 1 and Plant 2 must be revised to reflect the existence of just one facility at 58027 Charlotte Avenue. The facility mailing address should also reflect this revision.

Response 1

The cover page of the permit has been revised to exclude the reference to Plants 1 or 2 and has been revised with the correct facility address.

All forms at the end of the permit have been revised to indicate the correct source and mailing addresses.

The table of contents have been revised.

The following changes have been made to Condition A.1.

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

The Permittee owns and operates a fabricated metal products facility which manufactures light poles.

Authorized Individual:	Franco Garcia, General Manager
Source Address:	Plant 1 - 57843 Charlotte Avenue, Elkhart, IN 46517 Plant 2 - 58027 Charlotte Avenue, Elkhart, IN 46517
Mailing Address:	57843 58027 Charlotte Avenue, Elkhart, IN 46517
SIC Code:	3499
Source Location Status:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

Condition A.2 (Source Definition) has been deleted from the permit. The rest of the conditions in Section A have been re-numbered correctly.

~~A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]~~

~~This fabricated metal products company consists of two (2) plants:~~

~~(a) Plant 1 is located at 57843 Charlotte Avenue, Elkhart, IN 46517; and~~

~~(b) Plant 2 is located at 58027 Charlotte Avenue, Elkhart, IN 46517.~~

~~Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source.~~

~~This determination was made in FESOP 039-5571-00237, issued on December 13, 1996.~~

Comment 2

Emission Units identified as EU-01, paint spray booth and EU-02, shotblaster and all correlated requirements must be eliminated. These units were located at Plant 1, 57843 Charlotte Avenue and are no longer applicable given the property sale. Such requirements include, but should not be limited to:

- a) deletion of all operational, monitoring and reporting requirements for these units, and
- b) requirement for submittal of an annual emission statement. With the elimination of the spray booth, this facility will no longer have a PTE for VOC's greater than 10 TPY.

Response 2

The calculations in Appendix A have been revised and are attached (TSD Addendum App A, pages 1 through 5).

Section D.1 (which consisted of the requirements for Plant 1) has been deleted in its entirety. Since, emission unit EU-02 has been removed from the source, the potential to emit VOC is less than ten tons per year and since the source is located in Elkhart County, Condition C.20 (Emission Statement) is no longer applicable and has been deleted. The rest of Section C has been re-numbered accordingly.

The following revisions have been made to Condition A.3 (now re-numbered A.2).

~~A.32 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]~~

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

~~Plant 1 consists of the following emission units and pollution control devices:~~

~~(a) One (1) paint spray booth, identified as EU-01, equipped with one (1) high pressure airless spray gun, at a maximum coating capacity of 0.626 units per hour, with dry filters, identified as CD-01, for overspray control, exhausting at one (1) stack, identified as E1; and~~

~~(b) One (1) shotblaster, identified as EU-02, utilizing steel shot, with a maximum blast rate of 35.4 tons of steel per hour, exhausting through cartridge filters identified as CD-02, vented indoors.~~

~~Plant 2 consists of the following emission units and pollution control devices:~~

- (ea) One (1) shotblaster, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge **type** filters identified as CD-03a and ~~CD-03b to a HEPA filter~~, vented indoors; and
- (db) Two (2) powder coating booths, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04A has a maximum coating rate of 21.33 pounds per hour and is equipped with ~~two (2)~~ **three (3)** electrostatic applicators **only two of which can be used at any one time**, exhausting ~~indoors~~ through two (2) cartridge type dust collectors identified as CD-04a and CD-04b **and venting back into the system as make up air**. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting ~~indoors~~ through one (1) cartridge type dust collector identified as CD-04c **and venting back into the system as make up air**.

Comment 3

Deletion of insignificant activities identified as H-1 through H-10 and one 1.5 mmBtu/hr natural gas-fired make up air unit. These units were located at Plant 1, 57843 Charlotte Avenue and were included in the property sale.

Inclusion of the following insignificant activities:

- a) two 9.0 mmBtu/hr air make up units,
- b) one chip collector associated with the new hot aluminum extrusion process, and [The hot aluminum extrusion process, addressed in the administrative amendment submitted on June 1, 2000, included a chip collector from an aluminum saw. Particle size testing on the material collected by the chip collector indicates that 0.36% of the material is \leq 100 microns and 0.13% of the material is \leq 10 microns with a PTE of $<$ 5 TPY for both 100 and 10 microns classifying this as an insignificant activity.]

Revision of the mmBtu/hr rating of one natural gas fired heating unit from 3.75 mmBtu/hr to 3.0 mmBtu/hr.

Response 3

The following revisions have been made to Condition A.4 (now re-numbered A.3).

A.43 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) One (1) natural gas fired air make-up unit, with a maximum rated capacity of 3.3 million British thermal units per hour;
- (b) One (1) natural gas fired air make-up unit, with a maximum rated capacity of 2.2 million British thermal units per hour;
- ~~(c) One (1) natural gas fired heater, identified as H1, with a maximum rated capacity of 0.25 million British thermal units per hour, exhausting at one (1) stack;~~
- ~~(d) Eight (8) natural gas fired radiant heaters, identified as H2-H10, each heater with a maximum rated capacity of 0.5 million British thermal units per hour, each heater exhausting at one (1) stack;~~

- ~~(e)~~ ~~One (1) natural gas fired make-up air unit, with a maximum rated capacity of 1.5 million British thermal units per hour;~~
- (fc) One (1) natural gas fired heating unit, with a maximum rated capacity of ~~3.75~~ **3.0** million British thermal units per hour;
- (gd) Two (2) natural gas fired bake ovens, each oven with a maximum rated capacity of 3.0 million British thermal units per hour;
- (e) **Two (2) air make-up air units, each with a maximum rated capacity of 9.0 mmBtu/hr;**
- (hf) MIG welding stations;
- (ig) Gas metal arc welding;
- (jh) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (ki) Paved and unpaved roads and parking lots with public access;
- (lj) Burn tables;
- (mk) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
- (nl) Oxyacetylene cutting torches;
- (om) Cutting of metal parts;
- (pn) Aluminum wipe down operation; ~~and~~
- (qo) Hot aluminum extrusion process with no significant emissions; **and**
- (p) **One chip collector associated with the new hot aluminum extrusion process, and [The hot aluminum extrusion process, addressed in the administrative amendment submitted on June 1, 2000, included a chip collector from an aluminum saw. Particle size testing on the material collected by the chip collector indicates that 0.36% of the material is \leq 100 microns and 0.13% of the material is \leq 10 microns with a PTE of $<$ 5 TPY for both 100 and 10 microns classifying this as an insignificant activity.]**

Comment 4

Revision of the description of emission unit EU-03 to eliminate reference to HEPA filters to differentiate primary and secondary filter systems as CD-03a and CD-03b. [The ability of the control equipment for this process to provide 99% removal efficiency, which was the basis for the original FESOP permit PTE calculations, will still be provided without the use of HEPA filters.]

Revision of the description of emission unit EU-04A to indicate that the unit is equipped with three electrostatic applicators instead of two. The unit cannot operate more than two applicators at one time, but there is in actuality three applicators associated with this unit. A change in language to include three applicators will not change the maximum coating rate of 21.33 pounds per hour or the emission rate for this unit.

Response 4

Section D.2 (now re-numbered D.1) has been revised as follows:

SECTION D.21 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Plant 2 consists of the following emission units and pollution control devices:

- (ea) One (1) shotblaster, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge **type** filters identified as CD-03a and **CD-03b to a HEPA filter**, vented indoors; and
- (db) Two (2) powder coating booths, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04A has a maximum coating rate of 21.33 pounds per hour and is equipped with ~~two (2)~~ **three (3)** electrostatic applicators, **only two of which can be used at any one time**, exhausting ~~indoors~~ through two (2) cartridge type dust collectors identified as CD-04a and CD-04b **and venting back into the system as make-up air**. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting indoors through one (1) cartridge type dust collector identified as CD-04c.

(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.21.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter from the one (1) shotblaster, identified as EU-03 shall be limited to 13.83 pounds per hour, based on a process weight rate of 108 tons of steel shot per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter from the two (2) powder coating booths, identified as EU-04A and EU-04B shall be limited by the following:

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:

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

D.21.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 from the one (1) shotblaster, identified as EU-03 shall be limited to 7.43 pounds per hour, which is equivalent to 32.55 tons of PM10 per year.

D.21.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and its control device.

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

D.21.4 Particulate Matter (PM)

- (a) In order to comply with D.21.1(a), the cartridge filters for PM control shall be in operation at all times when the one (1) shotblaster, identified as EU-03 is in operation.
- (b) In order to comply with D.21.1(b), the cartridge type dust collectors shall be in operation at all times when the two (2) powder coating booths, identified as EU-04A and EU-04B are in operation.

D.21.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across each cartridge filter unit, **CD-03a and CD-03b** and HEPA filter controlling the one (1) shotblaster (EU-03) when the one (1) shotblaster (EU-03) is in operation **and venting to the atmosphere**. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading, the pressure drop across each cartridge filter unit CD-03a shall be maintained within is outside the normal range of 2.0 to 8.0 inches of water or a range established during the latest stack test and the pressure drop across the HEPA filter filter unit CD-03b shall be maintained within is outside the normal range of 0.5 and 2.0 inches of water or a range established during the latest stack test. **The ,the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Failure to Take Response Steps for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.****

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

D.21.6 Broken or Failed Cartridge Filter and HEPA Filter Detection

In the event that cartridge filter ~~or HEPA filter~~ failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.
- (b) For single compartment cartridge filters ~~and HEPA filters~~, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.21.7 Cartridge Filter and HEPA Filter Inspections

An inspection shall be performed each calendar quarter of all cartridge filters ~~and HEPA filters~~ controlling the one (1) shotblaster (EU-03) when venting to the atmosphere. A cartridge filter ~~and HEPA filter~~ inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridge filters shall be replaced.

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

D.21.8 Record Keeping Requirements

- (a) To document compliance with Condition D.21.5, the Permittee shall maintain the following:
 - (1) ~~Weekly~~ **Once per shift** records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (b) To document compliance with Condition D.21.7, the Permittee shall maintain records of the results of the inspections required under Condition D.21.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 5

Elimination of Section C.15, Emergency Reduction Plan. By agreeing to the terms of the FESOP, this facility no longer has a potential to emit any pollutant greater than 100 TPY. ERPs are only required for facility's with a potential to emit greater than 100 TPY.

Response 5

Condition C.15 (Emergency Reduction Plans) is not required because limited PM emissions are not greater than 100 tons per year. Condition C.15 will be deleted and the rest of Section C will be re-numbered accordingly.

Comment 6

Revision to the language regarding the Quarterly Deviation and Compliance Monitoring Report Form. Valmont is requesting that the form and reference to the form be changed to correctly note that this report is for reporting of deviations on a quarterly basis pursuant to Condition B.15. Condition B.15(a) excludes “an excursion from compliance monitoring parameters” unless tied to an applicable rule or limit. Therefore, not all excursions from monitoring parameters are deviations. To include the term “Compliance Monitoring” in the title of this report form is incorrect and misleading. The title of the report form should be corrected by deleting “and Compliance Monitoring”. This phrase should also be removed from the following conditions which are all referring to this form: B.15(a), B.15(c), and C.21(a). The first sentence of the report form is also not correct and should be deleted: “This report is an affirmation that the source has met all the requirements stated in this permit.” This report is for deviations and therefore is not “an affirmation that the source has met all the requirements.” Valmont is also requesting that the reporting period be changed from a quarterly basis to a semi-annual basis.

Response 6

The Quarterly or Semi-Annual Compliance Monitoring Report has been revised and is now called the Quarterly Deviation and Compliance Monitoring Report. The form requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. Every source will need to submit this report quarterly, except for sources with an applicable requirement with an alternate schedule for reporting deviations. Those sources will report deviations according to the schedule in the applicable requirement. No changes have been made to the Quarterly Deviation and Compliance Monitoring Report, Condition B.15(a), Condition B.15(c), or Condition C.21(a) as a result of this comment.

The following revisions have been made to the Technical Support Document under the appropriate sections (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Source Background and Description

Source Name: Valmont Industries, Inc.
Source Location: ~~Plant 1 - 57843 Charlotte Avenue, Elkhart, IN 46517~~
~~Plant 2 - 58027 Charlotte Avenue, Elkhart, IN 46517~~
County: Elkhart
SIC Code: 3499
Operation Permit No.: F039-14186-00237
Permit Reviewer: NH/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Valmont Industries, Inc. relating to the operation of a fabricated metal products facility which manufactures light poles. Valmont Industries, Inc. was issued FESOP 039-5571-00237 on December 13, 1996 that will expire on December 13, 2001.

Source Definition

~~_____ The Source Definition from the previous FESOP was incorporated into this permit as follows:~~

~~-~~

~~_____ This fabricated metal products company consists of two (2) plants:~~

~~(a) Plant 1 is located at 57843 Charlotte Avenue, Elkhart, IN 46517; and~~

~~(b) Plant 2 is located at 58027 Charlotte Avenue, Elkhart, IN 46517.~~

~~Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.~~

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

~~Plant 1 consists of the following emission units and pollution control devices:~~

~~(a) One (1) paint spray booth, identified as EU-01, equipped with one (1) high pressure airless spray gun, at a maximum coating capacity of 0.626 units per hour, with dry filters, identified as CD-01, for overspray control, exhausting at one (1) stack, identified as E1; and~~

~~(b) One (1) shotblaster, identified as EU-02, utilizing steel shot, with a maximum blast rate of 35.4 tons of steel per hour, exhausting through cartridge filters identified as CD-02; vented indoors.~~

~~Plant 2 consists of the following emission units and pollution control devices:~~

~~(ca) One (1) shotblaster, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge **type** filters identified as CD-03a and **CD-03b** to a HEPA filter, vented indoors; and~~

~~(db) Two (2) powder coating booths, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04A has a maximum coating rate of 21.33 pounds per hour and is equipped with ~~two (2)~~ **three (3)** electrostatic applicators, **only two of which can be used at any one time**, exhausting ~~indoors~~ through two (2) cartridge type dust collectors identified as CD-04a and CD-04b **and venting back into the system as make up air**. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting ~~indoors~~ through one (1) cartridge type dust collector identified as CD-04c **and venting back into the system as make up air**.~~

Insignificant Activities

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

~~(a) One (1) natural gas fired heater, identified as H1, with a maximum rated capacity of 0.25 million British thermal units per hour, exhausting at one (1) stack;~~

~~(b) Eight (8) natural gas fired radiant heaters, identified as H2-H10, each heater with a maximum rated capacity of 0.5 million British thermal units per hour, each heater exhausting at one (1) stack;~~

~~(c) One (1) natural gas fired make up air unit, with a maximum rated capacity of 1.5 million British thermal units per hour;~~

~~(da) One (1) natural gas fired heating unit, with a maximum rated capacity of 3.75 **3.0** million British thermal units per hour;~~

- (eb) Two (2) natural gas fired bake ovens, each oven with a maximum rated capacity of 3.0 million British thermal units per hour;
- (c) **Two (2) air make up units, each with a maximum rated capacity of 9.0 mmBtu/hr;**
- (fd) MIG welding stations;
- (ge) Gas metal arc welding;
- (hf) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (ig) Paved and unpaved roads and parking lots with public access;
- (jh) Burn tables;
- (ki) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
- (hj) Oxyacetylene cutting torches;
- (mk) Cutting of metal parts;
- (nl) Aluminum wipe down operation; ~~and~~
- (om) Hot aluminum extrusion process with no significant emissions, **consisting of a die cleaning process to clean metal dies (this process will use NaOH in the cleaning process and no regulated pollutants will be emitted);** and
- (n) **One chip collector associated with the new hot aluminum extrusion process with two (2) cold cut saws, and [The hot aluminum extrusion process, addressed in the administrative amendment submitted on June 1, 2000, included a chip collector from an aluminum saw. Particle size testing on the material collected by the chip collector indicates that 0.36% of the material is \leq 100 microns and 0.13% of the material is \leq 10 microns with a PTE of < 5 TPY for both 100 and 10 microns classifying this as an insignificant activity.] one (1) hot cut saw without a chip collector.**

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 75).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	5140.68 3862.65
PM-10	4437.79 3333.66
SO ₂	0.06 0.09
VOC	11.25 0.78
CO	10.35 11.96
NO _x	18.19 14.24

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

HAP's	Unrestricted Potential Emissions (tons/yr)
MIBK	0.86
Xylene	4.31
MEK	1.57
Ethylbenzene	0.65
HDI	0.02
TOTAL	7.42

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 13, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	HAPs
Surface Coating (EU-01)	0.99	0.99	--	10.28	--	--	4.31	7.42
Abrasive Blasting (EU-02 and EU-03)	50.25 37.84	43.21 32.55	--	--	--	--	--	--
Powder Coating (EU-04A and EU-04B)	0.70	0.70	--	--	--	--	--	--
Natural Gas Combustion	0.20 0.27	0.78 1.08	0.06 0.09	0.57 0.78	8.65 11.96	10.29 14.24	--	--
Insignificant Activities	8.88 7.98	8.88 7.98	--	0.40 --	1.70 --	7.90 --	--	--
Total Emissions	61.02 46.79	54.56 42.31	0.06 0.09	11.25 0.78	10.35 11.96	18.19 14.24	4.31 --	7.42 --

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

~~This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as 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).~~

This source is located in Elkhart County and the potential to emit VOC is less than ten (10) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, PM10 emission from the one (1) shotblaster, identified as EU-02 shall be limited to 2.44 pounds per hour and PM10 emissions from the one (1) shotblaster, identified as EU-03 shall be limited to 7.43 pounds per hour. This will limit the source-wide PM10 emissions to less than 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

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 meet the following, unless otherwise stated in this permit:

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

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

State Rule Applicability - Individual Facilities

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

~~The operation of the one (1) paint spray booth, identified as EU-01, constructed before July 1997, will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.~~

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) paint spray booth, identified as EU-01 shall be limited by the following:

~~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~~

~~The dry filters shall be in operation at all times the one (1) paint spray booth, identified as EU-01 is in operation, in order to comply with this limit.~~

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter from the one (1) shotblaster, identified as EU-02 shall be limited 6.06 pounds per hour.

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

~~$$E = 55.0 P^{0.11} - 40$$
 where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour~~

~~The cartridge filters shall be in operation at all times the one (1) shotblaster, identified as EU-02 is in operation, in order to comply with this limit.~~

- (ea) Pursuant to 326 IAC 6-3-2, the particulate matter from the one (1) shotblaster, identified as EU-03 shall be limited to 13.83 pounds per hour.

~~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~~

~~The cartridge filter and HEPA filter shall be in operation at all times the one (1) shotblaster, identified as EU-03 is in operation, in order to comply with this limit.~~

- (db) Pursuant to 326 IAC 6-3-2, the particulate matter from the two (2) powder coating booths, identified as EU-04A and EU-04B shall be limited by the following:

~~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

The three (3) cartridge type dust collectors shall be in operation at all times the two (2) powder coating booths, identified as EU-04A and EU-04B are in operation, in order to comply with this limit.

~~326 IAC 8-2-9 (Miscellaneous Metal Coating)~~

~~Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint spray booth, identified as EU-01 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.~~

~~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 submitted by the source and calculations made, the spray booth is in compliance with this requirement.~~

326 IAC 6-3-2 (Process Operations)

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

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.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

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

- ~~1. The one (1) paint spray booth, identified as EU-01 has applicable compliance monitoring conditions as specified below.~~

- ~~(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 paint spray booth stack (E1) while the booth is 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.~~

~~These monitoring conditions are necessary because the dry filters for the one (1) paint spray booth, identified as EU-01 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).~~

21. The ~~two (2)~~ **one (1)** shotblasters, identified as EU-02 and EU-03 ~~have has~~ applicable compliance monitoring conditions as specified below:
- (a) The Permittee shall record the total static pressure drop across each cartridge filter unit ~~and HEPA filter~~ controlling the ~~two (2)~~ **one (1)** shotblasters (EU-02 and EU-03) when the ~~two (2)~~ **one (1)** shotblasters (EU-02 and EU-03) are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each cartridge filter unit shall be maintained within the range of 2.0 to 8.0 inches of water or a range established during the latest stack test and the pressure drop across the HEPA filter shall be maintained within the range of 0.5 and 2.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
- The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (b) An inspection shall be performed each calendar quarter of all cartridge filters controlling the ~~two (2)~~ **one (1)** shotblasters (EU-02 and EU-03) when venting to the atmosphere. A cartridge filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridge filters shall be replaced.

- (c) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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.
- (d) For single compartment cartridge filters, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the cartridge filters for the ~~two (2)~~ **one (1)** shotblasters, identified as ~~EU-02 and~~ EU-03 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

- 32.** The two (2) powder coating booths, identified as EU-04A and EU-04B have applicable compliance monitoring conditions as specified below:
- (a) The Permittee shall record the total static pressure drop across each cartridge type dust collector controlling the two (2) powder coating booths, identified as EU-04A and EU-04B when the two (2) powder coating booths, identified as EU-04A and EU-04B are in operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
 - (b) An inspection shall be performed each calendar quarter of all cartridge type dust collectors controlling the two (2) powder coating booths, identified as EU-04A and EU-04B when venting to the atmosphere. A cartridge type dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridge type dust collectors shall be replaced.
 - (c) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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.

- (d) For single compartment cartridge type dust collectors, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the cartridge type dust collector must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

On February 22, 2002, Robert D. Waugaman of Bruce Carter Associates, L.L.C. (consultant for Valmont Industries, Inc.) submitted additional comments on behalf of Valmont Industries, Inc. on the proposed FESOP Renewal. The summary of the comments is as follows:

Comment 1

Please correct Section D.1(b), Facility Description, so it matches Section A.2(b) with the reference to CD-04c stating "venting back into the system as make up air."

Response 1

The following changes have been made to the facility description in Section D.1.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) shotblaster, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge type filters identified as CD-03a and CD-03b, vented indoors; and
- (b) Two (2) powder coating booths, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04A has a maximum coating rate of 21.33 pounds per hour and is equipped with three (3) electrostatic applicators, only two of which can be used at any one time, exhausting through two (2) cartridge type dust collectors identified as CD-04a and CD-04b and venting back into the system as make-up air. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting ~~indoors~~ through one (1) cartridge type dust collector identified as CD-04c **and venting back into the system as make up air.**

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

Comment 2

Update A.3(p) so there will be two (2) cold cut saws with associated chip collectors in the hot extrusion process, one at the inlet and one at the outlet of the hot aluminum extrusion process. Potential PM/PM10 emissions of each will be similar to the information already provided for the first one of these saws. In addition, add one (1) hot cut saw without a chip collector. Emissions for the hot cut saw will be similar to the before control emissions for the cold cut saw. Total emissions from these three (3) saws are estimated to be about 0.30 TPY. For clarification, there will only be three (3) saws in this area.

Response 2

The following changes have been made to Condition A.4 (now re-numbered A.3).

A.43 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]

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

- (p) **One chip collector associated with the new hot aluminum extrusion process with two (2) cold cut saws, and [The hot aluminum extrusion process, addressed in the administrative amendment submitted on June 1, 2000, included a chip collector from an aluminum saw. Particle size testing on the material collected by the chip collector indicates that 0.36% of the material is \leq 100 microns and 0.13% of the material is \leq 10 microns with a PTE of $<$ 5 TPY for both 100 and 10 microns classifying this as an insignificant activity.] one (1) hot cut saw without a chip collector.**

Comment 3

In Appendix A, all references to the address at "57843" should be removed.

Response 3

All references to the address at "57843" have been removed from Appendix A.

Comment 4

In Appendix A, page 2 of 5, the right hand column in the second "table" should be "Controlled Emissions".

Response 4

The right hand column in the second table of Appendix A, page 2 of 5 has been revised to state "Controlled Emissions".

Comment 5

Page 6 of 7 in Appendix A should be page 4 of 5

Response 5

The page numbering has been revised.

Comment 6

For the IDEM inspector's reference, a die cleaning process will be added in the hot extrusion area to clean the metal dies. The process will use NaOH in the cleaning process and no regulated pollutants will be emitted.

Response 6

The following revisions have been made to Condition A.3(o).

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

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

- (o) Hot aluminum extrusion process with no significant emissions, **consisting of a die cleaning process to clean metal dies (this process will use NaOH in the cleaning process and no regulated pollutants will be emitted);** and

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: Valmont Industries, Inc.
Source Location: Plant 1 - 57843 Charlotte Avenue, Elkhart, IN 46517
Plant 2 - 58027 Charlotte Avenue, Elkhart, IN 46517
County: Elkhart
SIC Code: 3499
Operation Permit No.: F039-14186-00237
Permit Reviewer: NH/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Valmont Industries, Inc. relating to the operation of a fabricated metal products facility which manufactures light poles. Valmont Industries, Inc. was issued FESOP 039-5571-00237 on December 13, 1996 that will expire on December 13, 2001.

Source Definition

The Source Definition from the previous FESOP was incorporated into this permit as follows:

This fabricated metal products company consists of two (2) plants:

- (a) Plant 1 is located at 57843 Charlotte Avenue, Elkhart, IN 46517; and
- (b) Plant 2 is located at 58027 Charlotte Avenue, Elkhart, IN 46517.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Plant 1 consists of the following emission units and pollution control devices:

- (a) One (1) paint spray booth, identified as EU-01, equipped with one (1) high pressure airless spray gun, at a maximum coating capacity of 0.626 units per hour, with dry filters, identified as CD-01, for overspray control, exhausting at one (1) stack, identified as E1; and
- (b) One (1) shotblaster, identified as EU-02, utilizing steel shot, with a maximum blast rate of 35.4 tons of steel per hour, exhausting through cartridge filters identified as CD-02, vented indoors.

Plant 2 consists of the following emission units and pollution control devices:

- (c) One (1) shotblaster, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge filters identified as CD-03 to a HEPA filter, vented indoors; and
- (d) Two (2) powder coating booths, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04A has a maximum coating rate of 21.33 pounds per hour and is equipped with two (2) electrostatic applicators, exhausting indoors through two (2) cartridge type dust collectors identified as CD-04a and CD-04b. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting indoors through one (1) cartridge type dust collector identified as CD-04c.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) One (1) natural gas fired air make-up unit, with a maximum rated capacity of 3.3 million British thermal units per hour; and
- (b) One (1) natural gas fired air make-up unit, with a maximum rated capacity of 2.2 million British thermal units per hour.

Insignificant Activities

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

- (a) One (1) natural gas fired heater, identified as H1, with a maximum rated capacity of 0.25 million British thermal units per hour, exhausting at one (1) stack;
- (b) Eight (8) natural gas fired radiant heaters, identified as H2-H10, each heater with a maximum rated capacity of 0.5 million British thermal units per hour, each heater exhausting at one (1) stack;
- (c) One (1) natural gas fired make up air unit, with a maximum rated capacity of 1.5 million British thermal units per hour;
- (d) One (1) natural gas fired heating unit, with a maximum rated capacity of 3.75 million British thermal units per hour;
- (e) Two (2) natural gas fired bake ovens, each oven with a maximum rated capacity of 3.0 million British thermal units per hour;
- (f) MIG welding stations;
- (g) Gas metal arc welding;

- (h) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (i) Paved and unpaved roads and parking lots with public access;
- (j) Burn tables;
- (k) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
- (l) Oxyacetylene cutting torches;
- (m) Cutting of metal parts;
- (n) Aluminum wipe down operation; and
- (o) Hot aluminum extrusion process with no significant emissions.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) FESOP 039-5571-00237, issued on December 13, 1996.
- (b) First Administrative Amendment 039-8944-00237, issued on September 24, 1997.
- (c) First Significant Permit Modification 039-9630-00237, issued on January 19, 1999.
- (d) Second Administrative Amendment 039-11251-00237, issued on September 9, 1999.
- (e) Third Administrative Amendment 039-12442-00237, issued on August 28, 2000.

All conditions from previous approvals were incorporated into this FESOP except for the following condition which has been revised as follows:

FESOP 039-5571-00237, issued on December 13, 1996.

Condition A.3(b): ~~Thirteen~~ **Eight (8)** natural gas fired radiant heaters, identified as H2-H140, each heater with a maximum rated capacity of 0.5 million British thermal units per hour, each heater exhausting at one (1) stack;

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal 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 Renewal application for the purposes of this review was received on March 15, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 7).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	5140.68
PM-10	4437.79
SO ₂	0.06
VOC	11.25
CO	10.35
NO _x	18.19

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

HAP's	Unrestricted Potential Emissions (tons/yr)
MIBK	0.86
Xylene	4.31
MEK	1.57
Ethylbenzene	0.65
HDI	0.02
TOTAL	7.42

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 13, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	HAPs
Surface Coating (EU-01)	0.99	0.99	--	10.28	--	--	4.31	7.42
Abrasive Blasting (EU-02 and EU-03)	50.25	43.21	--	--	--	--	--	--
Powder Coating (EU-04A and EU-04B)	0.70	0.70	--	--	--	--	--	--
Natural Gas Combustion	0.20	0.78	0.06	0.57	8.65	10.29	--	--
Insignificant Activities	8.88	8.88	--	0.40	1.70	7.90	--	--
Total Emissions	61.02	54.56	0.06	11.25	10.35	18.19	4.31	7.42

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart 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

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as 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).

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, PM10 emission from the one (1) shotblaster, identified as EU-02 shall be limited to 2.44 pounds per hour and PM10 emissions from the one (1) shotblaster, identified as EU-03 shall be limited to 7.43 pounds per hour. This will limit the source-wide PM10 emissions to less than 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.

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 meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

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

The operation of the one (1) paint spray booth, identified as EU-01, constructed before July 1997, will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) paint spray booth, identified as EU-01 shall be limited by the following:

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

The dry filters shall be in operation at all times the one (1) paint spray booth, identified as EU-01 is in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter from the one (1) shotblaster, identified as EU-02 shall be limited 6.06 pounds per hour.

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cartridge filters shall be in operation at all times the one (1) shotblaster, identified as EU-02 is in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 6-3-2, the particulate matter from the one (1) shotblaster, identified as EU-03 shall be limited to 13.83 pounds per hour.

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:

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

The cartridge filter and HEPA filter shall be in operation at all times the one (1) shotblaster, identified as EU-03 is in operation, in order to comply with this limit.

- (d) Pursuant to 326 IAC 6-3-2, the particulate matter from the two (2) powder coating booths, identified as EU-04A and EU-04B shall be limited by the following:

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:

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

The three (3) cartridge type dust collectors shall be in operation at all times the two (2) powder coating booths, identified as EU-04A and EU-04B are in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint spray booth, identified as EU-01 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

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 submitted by the source and calculations made, the spray booth is in compliance with this requirement.

326 IAC 6-3-2 (Process Operations)

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

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.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

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

1. The one (1) paint spray booth, identified as EU-01 has applicable compliance monitoring conditions as specified below:
 - (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 paint spray booth stack (E1) while the booth is 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.

These monitoring conditions are necessary because the dry filters for the one (1) paint spray booth, identified as EU-01 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

2. The two (2) shotblasters, identified as EU-02 and EU-03 have applicable compliance monitoring conditions as specified below:
 - (a) The Permittee shall record the total static pressure drop across each cartridge filter unit and HEPA filter controlling the two (2) shotblasters (EU-02 and EU-03) when the two (2) shotblasters (EU-02 and EU-03) are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each cartridge filter unit shall be maintained within the range of 2.0 to 8.0 inches of water or a range established during the latest stack test and the pressure drop across the HEPA filter shall be maintained within the range of 0.5 and 2.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
 - (b) An inspection shall be performed each calendar quarter of all cartridge filters controlling the two (2) shotblasters (EU-02 and EU-03) when venting to the atmosphere. A cartridge filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridge filters shall be replaced.
 - (c) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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.
 - (d) For single compartment cartridge filters, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the cartridge filters for the two (2) shotblasters, identified as EU-02 and EU-03 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

3. The two (2) powder coating booths, identified as EU-04A and EU-04B have applicable compliance monitoring conditions as specified below:
 - (a) The Permittee shall record the total static pressure drop across each cartridge type dust collector controlling the two (2) powder coating booths, identified as EU-04A and EU-04B when the two (2) powder coating booths, identified as EU-04A and EU-04B are in operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
 - (b) An inspection shall be performed each calendar quarter of all cartridge type dust collectors controlling the two (2) powder coating booths, identified as EU-04A and EU-04B when venting to the atmosphere. A cartridge type dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective cartridge type dust collectors shall be replaced.
 - (c) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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.
 - (d) For single compartment cartridge type dust collectors, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the cartridge type dust collector must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this fabricated metal products facility which manufactures light poles shall be subject to the conditions of the attached proposed **FESOP No.: F039-14186-00237**.

Appendix A: Emission Calculations

Company Name: Valmont Industries, Inc.
Address City IN Zip: 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Pit ID: 039-00237
Reviewer: NH/EVP

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Abrasive Blasting	Powder Coating	Natural Gas Combustion	Insignificant Activities	TOTAL
PM	3,784.32	70.08	0.27	7.98	3,862.65
PM10	3,254.52	70.08	1.08	7.98	3,333.66
SO2	0.00	0.00	0.09	0.00	0.09
NOx	0.00	0.00	14.24	0.00	14.24
VOC	0.00	0.00	0.78	0.00	0.78
CO	0.00	0.00	11.96	0.00	11.96
total HAPs	0.00	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year.					
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Abrasive Blasting	Powder Coating	Natural Gas Combustion	Insignificant Activities	TOTAL
PM	37.84	0.70	0.27	7.98	46.79
PM10	32.55	0.70	1.08	7.98	42.31
SO2	0.00	0.00	0.09	0.00	0.09
NOx	0.00	0.00	14.24	0.00	14.24
VOC	0.00	0.00	0.78	0.00	0.78
CO	0.00	0.00	11.96	0.00	11.96
total HAPs	0.00	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year, after control.					

**Appendix A: Emission Calculations
Abrasive Blasting**

Company Name: Valmont Industries, Inc.
Address City IN Zip: 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Pit ID: 039-00237
Reviewer: NH/EVP

Potential to Emit (tons/yr):

Process	Material Usage (lbs/hr)	Control Efficiency	Uncontrolled Emissions (lbs/hr)	Uncontrolled Emissions (tons/yr)
Powder Coating (EU-04)	32	99.00%	16	70.08

Methodology

Powder Coat Maximum Usage Rate (lb/hr) = 32 lbs/hr. Assume 50% of the coating material emitted as worse case.
 Potential Powder Coat Emissions (ton/yr) = 16 lbs/hr * 8760 hrs/yr * 1ton/2,000 lbs

Limited Emissions (tons/yr):

Process	Material Usage (lbs/hr)	Control Efficiency	Controlled Emissions (lbs/hr)	Controlled Emissions (tons/yr)
Powder Coating (EU-04)	32	99.00%	16	0.70

Methodology

Powder Coat Maximum Usage Rate (lb/hr) = 32 lbs/hr. Assume 50% of the coating material emitted as worse case.
 Potential Powder Coat Emissions (ton/yr) = 16 lbs/hr * 8760 hrs/yr * 1ton/2,000 lbs * (1 - control efficiency)

**Appendix A: Emission Calculations
Abrasive Blasting**

Company Name: Valmont Industries, Inc.
Address City IN Zip: 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Plt ID: 039-00237
Reviewer: NH/EVP

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Calculations for EU-03

Flow Rate (FR) (lb/hr) = **216000.000** per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =

0.004

FR = Flow Rate (lb/hr) =

216000.000

w = fraction of time of wet blasting =

0 %

N = number of nozzles =

1

Uncontrolled PM Emissions =	864.00 lb/hr
	3784.32 ton/yr
Uncontrolled PM10 Emissions =	743.04 lb/hr
	3254.52 ton/yr

Controlled PM Emissions =	8.64 lb/hr
	37.84 ton/yr
Controlled PM10 Emissions =	7.43 lb/hr
	32.55 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Valmont Industries, Inc.
Address City IN Zip: 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Pit ID: 039-00237
Reviewer: NH/EVP

Heat Input Capacity
MMBtu/hr

32.5

Potential Throughput
MMCF/yr

284.7

Facilities	MMBtu/hr
Air make-up unit	3.3
Air make-up unit	2.2
Heating unit	3
Bake ovens	6
Air make-up units	18
Total	32.5

	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	0.27	1.08	0.09	14.24	0.78	11.96

*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).

**Appendix A: Emission Calculations
Abrasive Blasting**

Company Name: Valmont Industries, Inc.
Address City IN Zip: 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Pit ID: 039-00237
Reviewer: NH/EVP

Pollutant	Welding	Burn Tables	Pole Wipe Down	Oxy-Acetyl Torches	Total
PM	4.82	0.53	0.00	2.63	7.98
PM-10	4.82	0.53	0.00	2.63	7.98
SO2	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00	0.00
VOC	0.00	0.00	0.00	0.00	0.00
CO	0.00	0.00	0.00	0.00	0.00

Appendix A: Emission Calculations

Company Name: Valmont Industries, Inc.
Address City IN Zip: 57843 & 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Pit ID: 039-00237
Reviewer: NH/EVP

Uncontrolled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Abrasive Blasting	Surface Coating	Powder Coating	Natural Gas Combustion	Insignificant Activities	TOTAL
PM	5,024.74	36.78	70.08	0.20	8.88	5,140.68
PM10	4,321.27	36.78	70.08	0.78	8.88	4,437.79
SO2	0.00	0.00	0.00	0.06	0.00	0.06
NOx	0.00	0.00	0.00	10.29	7.90	18.19
VOC	0.00	10.28	0.00	0.57	0.40	11.25
CO	0.00	0.00	0.00	8.65	1.70	10.35
total HAPs	0.00	7.42	0.00	0.00	0.00	7.42
worst case single HAP	0.00	4.31	0.00	0.00	0.00	4.31
Total emissions based on rated capacity at 8,760 hours/year.						
Controlled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Abrasive Blasting	Surface Coating	Powder Coating	Natural Gas Combustion	Insignificant Activities	TOTAL
PM	50.25	0.99	0.70	0.20	8.88	61.02
PM10	43.21	0.99	0.70	0.78	8.88	54.56
SO2	0.00	0.00	0.00	0.06	0.00	0.06
NOx	0.00	0.00	0.00	10.29	7.90	18.19
VOC	0.00	10.28	0.00	0.57	0.40	11.25
CO	0.00	0.00	0.00	8.65	1.70	10.35
total HAPs	0.00	7.42	0.00	0.00	0.00	7.42
worst case single HAP	0.00	4.31	0.00	0.00	0.00	4.31
Total emissions based on rated capacity at 8,760 hours/year, after control.						

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

Company Name: Valmont Industries, Inc.
Address City IN Zip: 57843 & 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Pit ID: 039-00237
Reviewer: NH/EVP

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
TNEME-FASTPRIME, CONVERTER & #4 FASTPRIME	12.02	26.55%	0.0%	26.6%	0.0%	54.14%	0.55000	0.573	3.19	3.19	1.01	24.14	4.41	10.97	5.89	10%
ENDURA SHIELD, ENDURA SHIELD, & THINNER	9.61	14.22%	0.0%	14.2%	0.0%	81.87%	0.49100	0.573	1.37	1.37	0.38	9.23	1.68	9.14	1.67	10%
ENDURA SHIELD, ENDURA SHIELD, & THINNER	9.61	14.22%	0.0%	14.2%	0.0%	81.87%	0.49100	0.573	1.37	1.37	0.38	9.23	1.68	9.14	1.67	10%
ENDURA SHIELD, ENDURA SHIELD, & THINNER	9.61	14.22%	0.0%	14.2%	0.0%	81.87%	0.49100	0.573	1.37	1.37	0.38	9.23	1.68	9.14	1.67	10%
Series 37H & XYLENE	12.46	27.88%	0.0%	27.9%	0.0%	53.79%	0.38400	0.626	3.47	3.47	0.84	20.04	3.66	8.52	6.46	10%
RED PRIMER	13.07	21.58%	0.0%	21.6%	0.0%	60.20%	0.35800	0.626	2.82	2.82	0.63	15.17	2.77	9.05	4.69	10%
XYLENE-EQP CLEAN	7.17	100.00%	0.0%	100.0%	0.0%	0.00%	0.11200	0.626	7.17	7.17	0.50	12.06	2.20	0.00	ERR	100%
MEK-EQP CLEAN	6.75	100.00%	0.0%	100.0%	0.0%	0.00%	0.03400	1.145	6.75	6.75	0.26	6.31	1.15	0.00	ERR	100%
Undercoating Systems:																
Ameron 78hb & 65	13.1	18.47%	0.0%	18.5%	0.0%	69.35%	0.44000	0.540	2.42	2.42	0.57	13.80	2.52	10.00	3.49	10%
Madison Component A & B	11.25	0.00%	0.0%	0.0%	0.0%	100.00%	0.66000	0.540	0.00	0.00	0.00	0.00	0.00	15.81	0.00	10%

State Potential Emissions

Add worst case coating to all solvents

2.35 56.31 10.28 36.78

Controlled Potential Emissions

Total Controlled Potential Emissions:	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
		0.00%	97.30%	2.35	56.31	10.28

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Valmont Industries, Inc.
Address City IN Zip: 57843 & 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP#: 039-14186
Pit ID: 039-00237
Permit Reviewer: NH/EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MIBK	Weight % Xylene	Weight % MEK	Weight % Ethyl Benzene	Weight % HDI	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	MEK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	HDI Emissions (ton/yr)
TNEME-FASTPRIME, CONVERTER & #4 FASTPRIME	12.02	0.550000	0.573	5.20%	11.50%	0.00%	2.00%	0.00%	0.86	1.91	0.00	0.33	0.00
ENDURA SHIELD, ENDURA SHIELD, & THINNER	9.61	0.491000	0.573	0.00%	0.00%	3.50%	0.00%	0.20%	0.00	0.00	0.41	0.00	0.02
ENDURA SHIELD, ENDURA SHIELD, & THINNER	9.61	0.491000	0.573	0.00%	0.00%	3.50%	0.00%	0.20%	0.00	0.00	0.41	0.00	0.02
ENDURA SHIELD, ENDURA SHIELD, & THINNER	9.61	0.491000	0.573	0.00%	0.00%	3.50%	0.00%	0.20%	0.00	0.00	0.41	0.00	0.02
Series 37H & XYLENE	12.46	0.384000	0.626	3.50%	4.60%	0.00%	0.10%	0.00%	0.46	0.60	0.00	0.01	0.00
RED PRIMER	13.07	0.358000	0.626	0.00%	15.20%	2.30%	3.70%	0.00%	0.00	1.95	0.30	0.47	0.00
Clean-up Solvents:													
XYLENE-EQP CLEAN	7.17	0.112000	0.626	0.00%	95.00%	0.00%	5.00%	0.00%	0.00	2.09	0.00	0.11	0.00
MEK-EQP CLEAN	6.75	0.034000	1.145	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	1.15	0.00	0.00
Undercoating Systems:													
Ameron 78hb & 65	13.1	0.440000	0.540	0.00%	2.00%	0.00%	0.50%	0.00%	0.00	0.27	0.00	0.07	0.00
Madison Component A & B	11.25	0.660000	0.540	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions **0.86 4.31 1.57 0.65 0.02**

METHODOLOGY

Total HAPS = 7.42

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

**Appendix A: Emission Calculations
Abrasive Blasting**

Company Name: Valmont Industries, Inc.
Address City IN Zip: 57843 & 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Pit ID: 039-00237
Reviewer: NH/EVP

Potential to Emit (tons/yr):

Process	Material Usage (lbs/hr)	Control Efficiency	Uncontrolled Emissions (lbs/hr)	Uncontrolled Emissions (tons/yr)
Powder Coating (EU-04)	32	99.00%	16	70.08

Methodology

Powder Coat Maximum Usage Rate (lb/hr) = 32 lbs/hr. Assume 50% of the coating material emitted as worse case.
 Potential Powder Coat Emissions (ton/yr) = 16 lbs/hr * 8760 hrs/yr * 1ton/2,000 lbs

Limited Emissions (tons/yr):

Process	Material Usage (lbs/hr)	Control Efficiency	Uncontrolled Emissions (lbs/hr)	Uncontrolled Emissions (tons/yr)
Powder Coating (EU-04)	32	99.00%	16	0.70

Methodology

Powder Coat Maximum Usage Rate (lb/hr) = 32 lbs/hr. Assume 50% of the coating material emitted as worse case.
 Potential Powder Coat Emissions (ton/yr) = 16 lbs/hr * 8760 hrs/yr * 1ton/2,000 lbs * (1 - control efficiency)

**Appendix A: Emission Calculations
Abrasive Blasting**

Company Name: Valmont Industries, Inc.
Address City IN Zip: 57843 & 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Plt ID: 039-00237
Reviewer: NH/EVP

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Calculations for EU-02

Flow Rate (FR) (lb/hr) = 70800.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =

0.004
70800.000
0 %
1

Uncontrolled PM Emissions =	283.20 lb/hr
	1240.42 ton/yr
Uncontrolled PM10 Emissions =	243.55 lb/hr
	1066.76 ton/yr
Controlled PM Emissions =	2.83 lb/hr
	12.40 ton/yr
Controlled PM10 Emissions =	2.44 lb/hr
	10.67 ton/yr

Calculations for EU-03

Flow Rate (FR) (lb/hr) = 216000.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =

0.004
216000.000
0 %
1

Uncontrolled PM Emissions =	864.00 lb/hr
	3784.32 ton/yr
Uncontrolled PM10 Emissions =	743.04 lb/hr
	3254.52 ton/yr
Controlled PM Emissions =	8.64 lb/hr
	37.84 ton/yr
Controlled PM10 Emissions =	7.43 lb/hr
	32.55 ton/yr

Total Emissions from EU-02 and EU-03

Uncontrolled PM Emissions =	5024.74 ton/yr
Uncontrolled PM10 Emissions =	4321.27 ton/yr
Controlled PM Emissions =	50.25 ton/yr
Controlled PM10 Emissions =	43.21 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
 Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
 Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)
 E = EF x FR x (1-w/200) x N
 w should be entered in as a whole number (if w is 50%, enter 50)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Valmont Industries, Inc.
Address City IN Zip: 57843 & 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Pit ID: 039-00237
Reviewer: NH/EVP

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
23.5	205.9

Facilities	MMBtu/hr
Air make-up unit	3.3
Air make-up unit	2.2
Air make-up unit	1.5
Radiant heater	0.25
Thirteen radiant heaters	6.5
Heating unit	3.75
Bake ovens	6
Total	23.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.20	0.78	0.06	10.29	0.57	8.65

*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).

**Appendix A: Emission Calculations
Abrasive Blasting**

Company Name: Valmont Industries, Inc.
Address City IN Zip: 57843 & 58027 Charlotte Avenue, Elkhart, IN 46517
FESOP: 039-14186
Pit ID: 039-00237
Reviewer: NH/EVP

Pollutant	Welding	Burn Tables	Combustion	Pole Wipe Down	Oxy-Acetyl Torches	Total
PM	4.82	0.53	0.90	0.00	2.63	8.88
PM-10	4.82	0.53	0.90	0.00	2.63	8.88
SO2	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	7.90	0.00	0.00	7.90
VOC	0.00	0.00	0.40	0.00	0.00	0.40
CO	0.00	0.00	1.70	0.00	0.00	1.70