



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: July 18, 2005
RE: Craddock Finishing, Inc. / 163-15006-00024
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 1/10/05



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY
AND
EVANSVILLE ENVIRONMENTAL PROTECTION
AGENCY**

**Craddock Finishing, Inc.
1400 W. Illinois St.
Evansville, Indiana 47710**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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. 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.

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.: F163-15006-00024	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 18, 2005 Expiration Date: July 18, 2010

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Evansville Environmental Protection Agency (EEPA). 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 stationary surface coating operation.

Authorized Individual:	President
Source Address:	1400 W. Illinois St., Evansville, Indiana 47710
Mailing Address:	P.O. Box 269, Evansville, Indiana 47702-0269
General Source Phone:	(812) 425-2691
SIC Code:	3479
Source Location Status:	Vanderburgh Nonattainment for ozone under the 8-hour standard Nonattainment for PM2.5
Source Status:	Attainment for all other criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules and Nonattainment NSR; 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) Twelve (12) spray paint booths identified as 3 (constructed in 1988), 8-11 (constructed in 1972), 14-18 (constructed in 1984), 20 and 24 (constructed in 1983). Each booth uses one air atomization spray gun, and is equipped with dry filters for particulate matter control, and each exhausts through one (1) stack respectively identified as V3, S6, S7, S8, S11, S14, S15, S16, S17, S18, S22 and S26;
- (b) Two (2) spray paint booths identified as EU 5 and 6, constructed in 1975 and 1990, respectively. Each booth uses one HVLP spray gun, and is equipped with dry filters for particulate matter control, and each exhausts through one (1) stack respectively identified as S1 and S2;
- (c) One (1) spray paint booth identified as EU 22, constructed in 1988. The booth uses one HVLP spray gun, and is equipped with dry filters for particulate matter control, and exhausts through one (1) stack identified as S24;
- (d) One (1) open top vapor degreaser identified as EU 4, constructed in 1988, exhausting through one (1) stack V4; and
- (e) Three (3) pneumatic blast booths identified as EU 28, 29, and 30, constructed in 1994, 1991 and 1992 respectively, each with a baghouse for particulate matter control, each exhausting through one (1) stack respectively identified as V7, V8 and V9.

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) new natural gas-fired paint drying oven with a heat input capacity of 500,000 British thermal units per hour (Btu/hr).
- (b) Seven (7) natural gas fired paint drying ovens, identified as EU 7, 12, 13, 19, 21, 23, and 25, with total heat input rate of 9.25 million British thermal units per hour;
- (c) Two (2) Wheelabrator mechanical blast booths identified as EU 1 and 2, with a baghouse for particulate matter control;
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (e) Infrared curing equipment;
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations;
- (h) Filter or coalescer media changeout;
- (i) Powder coat blow-off booth for cleaning powder hoses, guns, and hoppers by blowing them with air, exhausting through a 2,750 cfm fabric filter with PM emissions of 0.002 lbs/hr;
- (j) 0.4 MM Btu/hr natural gas dryer installed to dry metal parts in preparation for coating; and
- (k) Natural gas dryer with a heat input capacity of 4 MM Btu/hr.

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)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

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

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

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 Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) within a reasonable time, any information that IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

IDEM, OAQ and Evansville Environmental Protection Agency (EEPA) 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 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 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
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) 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.12 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, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA). IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 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, Evansville Environmental Protection Agency (EEPA), and IDEM Southwest Regional Office, 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.: 812-435-6145 (Evansville EEPA)

Facsimile No.: 812-435-6155 (Evansville EEPA)

Telephone No.: 812-380-2305 (IDEM Southwest Regional Office)

Telephone No.: 1-888-672-8323 (Toll free within Indiana)

Facsimile No.: 812-380-2304 (IDEM Southwest Regional Office)

- (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
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and Evansville Environmental Protection Agency (EEPA), may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and Evansville Environmental Protection Agency (EEPA), 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 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
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

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 not 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.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or Evansville Environmental Protection Agency (EEPA) determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or Evansville Environmental Protection Agency (EEPA), to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or Evansville Environmental Protection Agency (EEPA), at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or Evansville Environmental Protection Agency (EEPA), may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 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 Evansville Environmental Protection Agency (EEPA) 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
Indianapolis, IN 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

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

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) on or before the date it is due.

(2) If IDEM, OAQ and Evansville Environmental Protection Agency (EEPA), upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and Evansville Environmental Protection Agency (EEPA) takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and Evansville Environmental Protection Agency (EEPA), any additional information identified as needed to process the application.

B.17 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
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

Any such application shall 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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 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
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and Evansville Environmental Protection Agency (EEPA), in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) 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).
- (c) 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.19 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.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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, Evansville Environmental Protection Agency (EEPA), 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 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
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

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 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions 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.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 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. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
 - (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.3 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) 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.4 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.5 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.6 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.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

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 14-10-1 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) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented 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.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

- (b) 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]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

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 and Evansville Environmental Protection Agency (EEPA) 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 time frame 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from 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 response action 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 monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Evansville Environmental Protection Agency (EEPA) makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Evansville Environmental Protection Agency (EEPA) 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 Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do 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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

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) Twelve (12) spray paint booths identified as 3 (constructed in 1988), 8-11 (constructed in 1972), 14-18 (constructed in 1984), 20 and 24 (constructed in 1983). Each booth uses one air atomization spray gun, and is equipped with dry filters for particulate matter control, and each exhausts through one (1) stack respectively identified as V3, S6, S7, S8, S11, S14, S15, S16, S17, S18, S22 and S26;
- (b) Two (2) spray paint booths identified as EU 5 and 6, constructed in 1975 and 1990, respectively. Each booth uses one HVLP spray gun, and is equipped with dry filters for particulate matter control, and each exhausts through one (1) stack respectively identified as S1 and S2;
- (c) One (1) spray paint booth identified as EU 22, constructed in 1988. The booth uses one HVLP spray gun, and is equipped with dry filters for particulate matter control, and exhausts through one (1) stack identified as S24;

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

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

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge from spray booths EU 3, EU 6, EU 14-18, EU 20 and EU 24 into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for forced air dried coatings.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of spray booths EU 3, EU 6, EU 14-18, EU 20, and EU 24 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2] [326 IAC 2-3]

The total VOC usage at the fifteen (15) spray paint booths, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 90.94 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

Compliance with this limitation shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with this condition shall also make the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) not applicable to the source.

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The source wide usage of any single HAP, including clean-up solvents shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The source wide total HAP usage shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.5 PM₁₀ Emission Limitation [326 IAC 2-8-4][326 IAC 2-2]

The allowable PM₁₀ emissions from the fifteen (15) paint spray booths (EU 3, 8-11, 14-18, 20, 24, 5, 6, and 22) shall be limited as follows:

Booths	Stack ID	Limit (lbs/hr)
EU 3	V3	0.26
EU 5	S1	0.06
EU 6	S2	0.22
EU 8-11	S6, S7, S8, S11	4.69
EU14-18	S14, S15, S16, S17, S18	3.66
EU 20	S22	4.49
EU 22	S24	0.01
EU 24	S26	0.26

Compliance with these limitations shall limit the source-wide potential to emit of PM₁₀ to less than 100 tons per year. Therefore the requirements of 326 IAC 2-7 (Part 70) are not applicable. Compliance with these requirements shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) not applicable.

D.1.6 Particulate Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), PM emissions from the fifteen (15) spray paint booths (EU 3, 8-11, 14-18, 20, 24, 5, 6 and 22) shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.1.7 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 the spray paint facilities and their control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and the Evansville EPA reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Particulate Control [326 IAC 6-1-2] [326 IAC 2-8-4] [326 IAC 2-2]

In order to comply with Conditions D.1.5 and D.1.6, the dry filters for particulate control shall be in place and control emissions from the from the fifteen (15) paint spray booths (EU 3, 8-11, 14-18, 20, 24, 5, 6 and 22) at all times that the fifteen (15) paint spray booths are in operation.

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

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (V3, S6, S7, S8, S11, S14, S15, S16, S17, S18, S22, S26, S1, S2 and S24) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from 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 Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.3 and D.1.4 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.1, D.1.3 and D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each month;
 - (4) The total individual and combined HAP usage for each month;
 - (5) The weight of VOCs emitted for each compliance period; and

- (6) The weight of total individual and combined HAPs emitted for each compliance period.

- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of daily filter inspections, a log of weekly observations for overspray from surface coating booth stacks while one or more stacks are in operation, a log of monthly inspections of coating emissions from the stack and the presence of overspray on roof tops and nearby ground, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3 and D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (d) One (1) open top vapor degreaser identified as EU 4, constructed in 1988, exhausting through one (1) stack V4.

(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.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.2.2 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T][326 IAC 20]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

- (a) Pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:
- (1) The cleaning machine shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
 - (2) The cleaning machine shall be employed with a control combination of working mode cover and freeboard refrigeration device.
 - (3) Cleaning machine shall have a freeboard ratio of 0.75 or greater.
 - (4) Cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
 - (5) Cleaning machine shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.
 - (6) Cleaning machine shall have a primary condenser.
 - (7) Cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (b) Pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the degreasing operation are applicable:

- (1) Control air disturbances across the cleaning machine opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
 - (2) The parts baskets or the parts being cleaned in the cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - (3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
 - (4) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.
 - (5) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (6) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - (7) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - (8) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - (9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
 - (10) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.
 - (11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (12) Sponges, fabric, wood, and paper products shall not be cleaned.
- (c) Pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:
- (1) The Permittee shall conduct monitoring of each control device used to comply with §63. 463 as provided in 40 CFR 63.466, monitoring procedures.

- (2) Determine during each monitoring period if the control device used to comply with the above standards meets the following requirements:
- (A) The Permittee shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket of the freeboard refrigeration device is no greater than 30% of the solvent's boiling point.
 - (B) When using a working-mode cover the Permittee shall:
 - (i) ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
 - (ii) ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
 - (C) When using an idling-mode cover the Permittee shall:
 - (i) ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - (ii) ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-3]

Pursuant to 326 IAC 2-8-4, the amount of VOCs delivered to the open top vapor degreaser shall be limited to 8.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than 100 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 (Part 70), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset) not applicable.

D.2.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the amount of any single HAP delivered to the open top vapor degreaser shall be limited to 8.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of any combination of HAPs delivered to the open top vapor degreaser shall be limited to 8.76 tons per twelve (12) consecutive month period. This usage limit is required to limit the source-wide potential to emit of any single HAP and any combination of HAPs to less than 10 tons and 25 tons, respectively, per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.

D.2.5 Open Top Vapor Degreaser Operations [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, the owner or operator shall:

- (a) equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing workloads through the degreaser;
- (c) minimize solvent carry-out by:

- (1) racking parts to allow complete drainage;
 - (2) moving parts in and out of the degreaser at less than eleven (11) feet per minute;
 - (3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) tipping out any pools of solvent on the cleaned parts before removal;
 - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
 - (e) not occupy more than half of the degreaser's open top area with the workload;
 - (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
 - (g) never spray above the vapor level;
 - (h) repair solvent leaks immediately, or shut down the degreaser;
 - (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
 - (j) not use workplace fans near the degreaser opening;
 - (k) not allow visually detectable water in the solvent exiting the water separator; and
 - (l) provide a permanent, conspicuous label summarizing the operating requirements.

D.2.6 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 this facility and its control device.

Compliance Determination Requirements

D.2.7 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-8-5(a)(1)&(4)]

The Permittee is not required to test this facility by this permit or by 40 CFR Part 63; 40 CFR 63.465 Test Methods. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

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

D.2.8 Monitoring Procedures [326 IAC 2-7-6(1)][326 IAC 20][40 CFR 63, Subpart T]

Pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures:

- (a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraph(s) below:
 - (1) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket of the freeboard refrigeration device, during the idling mode.

- (b) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified in paragraph below:
 - (1) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- (c) The Permittee shall monitor the hoist speed as described below:
 - (1) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
 - (2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
 - (3) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
 - (4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

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

D.2.9 Recordkeeping Requirements

To document compliance with Condition D.2.8:

- (a) The Permittee shall maintain, in written or electronic form, records of the following information specified below, for the life time of the machine,
 - (1) Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
 - (2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - (3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.
- (b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:
 - (1) The results of control device monitoring required under Condition D.2.8 and 40 CFR 63.466.
 - (2) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

- (3) Estimates of annual solvent consumption for each solvent cleaning machine.
- (c) To document compliance with Conditions D.2.3 and D.2.4 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.2.3 and D.2.4.
 - (1) The amount and VOC and HAP content of each halogenated solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The volume weighted VOC and HAP content of the halogenated solvent used for each month;
 - (3) The weight of VOC and HAP emitted for each compliance period.
- (d) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

D.2.10 Reporting Requirements

- (a) A summary of the information to document compliance with Condition D.2.1 and the annual report required under 40 CFR 63.468(f) and the semi-annual report required under 40 CFR 63.468(h) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- (b) An initial statement of compliance for the open top vapor degreaser was submitted on May 1, 1998.
- (c) A quarterly summary of the information to document compliance with Conditions D.2.3 and D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (e) Three (3) pneumatic blast booths identified as EU 28, 29, and 30, constructed in 1994, 1991 and 1992 respectively, each with a baghouse for particulate matter control, each exhausting through one (1) stack respectively identified as V7, V8 and V9.
- (c) Two (2) Wheelabrator mechanical blast booths identified as EU 1 and 2, with a baghouse for particulate matter control.

(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.3.1 Particulate [326 IAC 6-1-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-1-2(a), the particulate matter emissions from the three (3) pneumatic blast booths (EU 28, EU 29 and EU 30) and the two (2) Wheelabrator blast booths shall each be limited to 0.03 grains per dry standard cubic foot of exhaust air. This is equivalent to a particulate allowable emission rate of the following:

Emission Unit	Exhaust Flow Rate (acfm)	Allowable PM Emissions (326 IAC 6-1-2) (lb/hr)
EU 28	800	0.21
EU 29	820	0.21
EU 30	820	0.21
EU 1	1700	0.44
EU 2	1700	0.44

Compliance with these limits shall also limit the source-wide potential to emit of PM to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) are not applicable.

D.3.2 PM₁₀ Emission Limitation [326 IAC 2-8-4][326 IAC 2-2]

The allowable PM₁₀ emissions from the pneumatic blasting operations at booths EU 28, EU 29 and EU 30 shall be limited to 0.63 pounds per hour. This is equivalent to 2.76 tons of PM₁₀ per twelve (12) consecutive month period, based on 8,760 hours of operation. Compliance with these limitations shall limit the source-wide potential to emit of PM₁₀ to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable. Compliance with these requirements shall also make the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) not applicable.

D.3.3 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 this facility and its control device.

Compliance Determination Requirements

D.3.4 Particulate Control [326 IAC 6-1-2] [326 IAC 2-8-4] [326 IAC 2-2]

In order to comply with Conditions D.3.1 and D.3.2, the three (3) baghouses for particulate control shall be in operation and control emissions from the three (3) pneumatic blast booths (EU 28, EU 29, and EU 30) at all times that the three (3) pneumatic blast booths are in operation.

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

D.3.5 Visible Emissions Notations

- (a) Visible emission notations of the pneumatic blast booths stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the pneumatic blast booths, at least once per day when the pneumatic blast booths are in operation when venting to the atmosphere. When or any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 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 -Preparation, Implementation, Records, and Reports. 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 deviation from this permit.

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

D.3.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the pneumatic blast booths when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.8 Broken or Failed Bag Detection

In the event that bag 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. 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations of the pneumatic blast booths stack exhausts once per day.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7 and the dates the vents are redirected.
- (d) To document compliance with Condition D.3.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) 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
and EVANSVILLE EPA**

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

Source Name: Craddock Finishing, Inc.
Source Address: 1400 W. Illinois St., Evansville, Indiana 47710
Mailing Address: P.O. Box 269, Evansville, Indiana 47702-0269
FESOP No.: F163-15006-00024

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

And

EVANSVILLE EPA

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

Source Name: Craddock Finishing, Inc.
Source Address: 1400 W. Illinois St., Evansville, Indiana 47710
Mailing Address: P.O. Box 269, Evansville, Indiana 47702-0269
FESOP No.: F163-15006-00024

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The 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• The Permittee must submit notice in writing or by facsimile within two (2) working 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

And

EVANSVILLE EPA

FESOP Quarterly Report (I)

Source Name: Craddock Finishing, Inc.
Source Address: 1400 W. Illinois St., Evansville, Indiana 47710
Mailing Address: P.O. Box 269, Evansville, Indiana 47702-0269
FESOP No.: F163-15006-00024
Facility: Fifteen (15) spray paint booths
Parameter: VOC
Limit: total VOC usage at the fifteen (15) spray paint booths, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 90.94 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Total Input Usage This Month (tons)	Total Input Usage Previous 11 Months (tons)	Total 12-Month Input Usage (tons)
Month 1			
Month 2			
Month 3			

- ☉ No deviation occurred in this quarter.
- ☉ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY**

COMPLIANCE DATA SECTION

And

EVANSVILLE EPA

FESOP Quarterly Report (II)

Source Name: Craddock Finishing, Inc.
 Source Address: 1400 W. Illinois St., Evansville, Indiana 47710
 Mailing Address: P.O. Box 269, Evansville, Indiana 47702-0269
 FESOP No.: F163-15006-00024
 Facility: Entire Source
 Parameter: single and total HAPs
 Limit:

- (a) the source wide usage of any single HAP, including clean-up solvents shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) the source wide total HAP usage shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

YEAR:

Month	Total Input Usage This Month (tons)		Total Input Usage Previous 11 Months (tons)		Total 12-Month Input Usage (tons)	
	Single* HAP	Combined HAPs	Single* HAP	Combined HAPs	Single* HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

*List the single HAP with the greatest emission rate

- ☉ No deviation occurred in this quarter.
- ☉ Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

And

EVANSVILLE EPA

FESOP Quarterly Report (III)

Source Name: Craddock Finishing, Inc.
Source Address: 1400 W. Illinois St., Evansville, Indiana 47710
Mailing Address: P.O. Box 269, Evansville, Indiana 47702-0269
FESOP No.: F163-15006-00024
Facility: one (1) open top vapor degreaser
Parameter: VOC
Limit: the VOC usage at the open top vapor degreaser shall be limited to 8.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Total Input Usage This Month (tons)	Total Input Usage Previous 11 Months (tons)	Total 12-Month Input Usage (tons)
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

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

Source Name: Craddock Finishing, Inc.
Source Address: 1400 W. Illinois St., Evansville, Indiana 47710
Mailing Address: P.O. Box 269, Evansville, Indiana 47702-0269
FESOP No.: F163-15006-00024

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and Evansville Environmental Protection Agency**

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

Source Background and Description

Source Name: Craddock Finishing, Inc.
Source Location: 1400 W. Illinois St., Evansville, Indiana 47710
County: Vanderburgh
SIC Code: 3479
Operation Permit No.: F163-15006-00024
Permit Reviewer: Seema Roy / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Craddock Finishing, Inc. relating to a stationary surface coating operation. Craddock Finishing, Inc. was issued FESOP 163-7735-00024 on July 30, 1997.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Twelve (12) spray paint booths identified as 3 (constructed in 1988), 8-11 (constructed in 1972), 14-18 (constructed in 1984), 20 and 24 (constructed in 1983). Each booth uses one air atomization spray gun, and is equipped with dry filters for particulate matter control, and each exhausts through one (1) stack respectively identified as V3, S6, S7, S8, S11, S14, S15, S16, S17, S18, S22 and S26;
- (b) Two (2) spray paint booths identified as EU 5 and 6, constructed in 1975 and 1990, respectively. Each booth uses one HVLP spray gun, and is equipped with dry filters for particulate matter control, and each exhausts through one (1) stack respectively identified as S1 and S2;
- (c) One (1) spray paint booth identified as EU 22, constructed in 1988. The booth uses one HVLP spray gun, and is equipped with dry filters for particulate matter control, and exhausts through one (1) stack identified as S24;
- (d) One (1) open top vapor degreaser identified as EU 4, constructed in 1988, exhausting through one (1) stack V4; and
- (e) Three (3) pneumatic blast booths identified as EU 28, 29, and 30, constructed in 1994, 1991 and 1992 respectively, each with a baghouse for particulate matter control, each exhausting through one (1) stack respectively identified as V7, V8 and V9.

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

There are no new facilities proposed at this source during this review process.

Insignificant Activities

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

- (a) One (1) new natural gas-fired paint drying oven with a heat input capacity of 500,000 British thermal units per hour (Btu/hr).
- (b) Seven (7) natural gas fired paint drying ovens, identified as EU 7, 12, 13, 19, 21, 23, and 25, with total heat input rate of 9.25 million British thermal units per hour;
- (c) Two (2) wheelabrator mechanical blast booths identified as EU 1 and 2, with a baghouse for particulate matter control;
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (e) Infrared curing equipment;
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (g) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations;
- (h) Filter or coalescer media changeout;
- (i) Powder coat blow-off booth for cleaning powder hoses, guns, and hoppers by blowing them with air, exhausting through a 2,750 cfm fabric filter with PM emissions of 0.002 lbs/hr;
- (j) 0.4 MM Btu/hr natural gas dryer installed to dry metal parts in preparation for coating; and
- (k) Natural gas dryer with a heat input capacity of 4 MM Btu/hr.

Existing Approvals

- (a) FESOP 163-7735-00024, issued on July 30, 1997;
- (b) First Administrative Amendment to FESOP 163-15835-00024; and
- (c) Second Administrative Amendment to FESOP 163-15576-00024.

The following terms and conditions from previous approvals have been revised in this FESOP:

- (a) The method of control combination for the open top vapor degreaser has been changed from reduced room draft, dwell, and freeboard ratio of 1.0 to working mode cover and freeboard refrigeration device. This change was made based on the information provided by the source.
- (b) The requirements of 326 IAC 2-6 (Emission Reporting) has been added since the source is located in Vanderburgh County and has the potential to emit more than ten (10) tons per year of VOC.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP:

All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

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 November 01, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 to 9).

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	659.9 (greater than 250)
PM-10	660.3 (greater than 100)
SO ₂	0.0 (less than 25)
VOC	832.1(greater than 100)
CO	5.2 (less than 25)
NO _x	6.2 (less than 25)

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)
TCE	less than 10
Xylene	less than 10
Toluene	greater than 10
MEK	greater than 10
Glycol Ethers	less than 10
TOTAL	greater than 25

Note: Taken from original FESOP F163-7735-00024

- (a) The unrestricted potential emissions of PM₁₀ and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP are equal to or greater than ten (10) tons per year and the unrestricted potential emissions of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) 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 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.086*
PM-10	0.086
SO ₂	not reported
VOC	12.0
CO	not reported
NO _x	not reported

* PM assumed equal to the reported pollutant, PM-10.

Potential to Emit After Issuance

The source, issued a FESOP on July 30, 1997, 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. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F163-7735-00024; issued on July 30, 1997).

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operation	12.4 ⁽¹⁾	12.4 ⁽¹⁾	0.00	<90.94 ⁽²⁾	0.00	0.00	Less than 16.24 tons/yr for combination and 10 tons/yr for any single
Vapor Degreaser	0.00	0.00	0.00	8.76	0.00	0.00	8.76 for combination and 8.76 for any single
Shot Blasting	2.76 ⁽³⁾	2.76 ⁽³⁾	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.10	0.50	0.00	0.30	5.20	6.20	0.00
Total PTE After Issuance	15.26	15.66	0.00	<100	5.20	6.20	Less than 25 tons/yr for combination and 10 tons/yr for any single

Notes:

- Reflects the use of particulate matter control devices which shall be operated at all times the processes are in operation. Assumes all PM equal to PM₁₀.
- Usage limit required to limit the potential to emit of VOC to less than 100 tons per 12 consecutive month period such that the requirement of 326 IAC 2-7 shall not apply.
- Reflects the PM and PM₁₀ emissions based on 326 IAC 6-1-2 allowable and 8760 hours of operation per year (assumes PM = PM₁₀).

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
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. Vanderburgh County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Vanderburgh County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed sources 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

This source is not subject to 326 IAC 2-7 (Part 70 Permit Program) requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is limited to less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is limited to less than 10 tons per year, and
- (c) any combination of HAPs is limited to less than 25 tons/year.

This status is based on the information provided by the source.

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) This source is subject to the Halogenated Solvent Cleaning NESHAP, 40 CFR Parts 9 and 63. The provisions 40 CFR Part 63, subpart T apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any of the listed halogenated HAP solvents, or any combination of the listed halogenated HAP solvents, in a total concentration greater than 5 % by weight, as a cleaning and/or drying agent. Craddock Finishing, Inc. operates an Open Top Vapor Degreaser which uses trichloroethylene (100%) as the cleaning solvent. This is one of the listed halogenated solvents. Therefore, the Open Top Vapor Degreaser for this source is subject to the following requirements of the Halogenated Solvent Cleaning NESHAP.
- (1) Pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:
- (A) The cleaning machine shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
 - (B) The cleaning machine shall be employed with a control combination of working mode cover and freeboard refrigeration device.
 - (C) Cleaning machine shall have a freeboard ratio of 0.75 or greater.
 - (D) Cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
 - (E) Cleaning machine shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.
 - (F) Cleaning machine shall have a primary condenser.
 - (G) Cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (2) Pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the degreasing operation are applicable:
- (A) Control air disturbances across the cleaning machine opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
 - (B) The parts baskets or the parts being cleaned in the cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.

- (C) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
- (D) Parts shall be oriented so that the solvents drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.
- (E) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
- (F) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
- (G) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (H) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (I) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
- (J) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.
- (K) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
- (L) Sponges, fabric, wood, and paper products shall not be cleaned.

- (3) Pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:
- (A) The Permittee shall conduct monitoring of each control device used to comply with §63. 463 as provided in 40 CFR63. 466, monitoring procedures.
 - (B) Determine during each monitoring period if the control device used to comply with the above standards meets the following requirements:
 - (i) The Permittee shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket of the freeboard refrigeration device is no greater than 30% of the solvent's boiling point.
 - (ii) When using a working-mode cover the Permittee shall:
 - ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
 - ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
 - (C) When using an idling-mode cover the Permittee shall:
 - (i) ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - (ii) ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart Mmmm for Miscellaneous Metal Parts and Products Surface Coating), because the source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart Pppp for Plastic Parts Surface Coating), because the source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively.
- (e) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Generally, such requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, that meets the following criteria:

- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
- (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
- (3) the unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

- (f) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source, because the source has a limited potential to emit of less than 10 tons per year of a single HAP and less than 25 tons per year of the combination of HAPs.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

The different spray paint booths for this source were constructed between 1972 and 1984. Although booths EU 3, 6, 14 -18, 20, 22 and 24 were constructed after the August 7, 1980 rule applicability date for PSD, this source is not considered a major source because it is not one of the 28 listed source categories, the source has always been using less than 100 tons per year VOC since constructed, and as a FESOP source the total input usage of VOC shall be limited to less than 100 tons per year, and the control technology and related compliance requirements for particulates shall limit the potential to emit of PM₁₀ (and PM) to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) shall not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

All the spray booths for the surface coating operation were constructed before the July 27, 1997 rule applicability date and as a FESOP source the source shall limit its single and combined HAP emissions to less than 10 tpy and 16.24 tpy, respectively, at the surface coating booths. Therefore the requirements of this rule do not apply to the spray booths for surface coating operation.

The open top vapor degreaser for this source is not subject to the requirements of this rule because it was constructed in 1988 (before the July 27, 1997 rule applicability date) and it is subject to Halogenated solvent Cleaning Machine NESHAP (40 CFR Part 63, Subpart T).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Vanderburgh 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 submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 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).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule the following condition shall apply to this surface coating operation:

- (a) The amount of VOCs delivered to the applicators of the surface coating operations plus the amount of VOCs used for clean-up solvents shall be limited to less than 90.94 tons per twelve (12) consecutive month period. This usage limit is required to limit the source-wide potential to emit of VOC to less than 100 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable. Compliance with this condition shall also make the requirements of 326 IAC 2-2 (PSD), not applicable to the source.
- (b) The source wide usage of any single HAP, including clean-up solvents shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The source wide total HAP usage shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.
- (d) The total solids input to the applicators of the fifteen (15) spray booths, based on 50% transfer efficiency of the air atomization spray gun booths and 75% transfer efficiency of the HVLP spray gun booths, and 90% control efficiency of the dry filters shall be limited as follows:

$$A (1-0.5) (1-0.9) + B (1-0.75) (1-0.9) < 96.74 \quad \text{tpy}$$

equivalent to:

$$A + \frac{1}{2} B < 1934.8 \text{ tpy}$$

where:

A = Total solids input at the air atomized air spray guns

B = Total solids input at the HVLP spray guns

Therefore, the total solids input at the air atomized spray gun booths and half of the total solids input at the HVLP spray gun booths shall not exceed 1934.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is equivalent to PM/PM₁₀ emissions of less than 100 tons per year from the entire source. Compliance with this limit shall also make the requirements of 326 IAC 2-7, Part 70, and 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) not applicable.

- (e) The allowable PM₁₀ emissions from the pneumatic blasting operations are limited to 0.63 pounds per hour. Based on 8760 hours of operation at rated capacity for twelve (12)

month period, the allowable PM₁₀ emissions from the pneumatic blasting operations are 2.76 tons. Compliance with this limit shall limit the source-wide potential to emit of PM₁₀ to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 are not applicable.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Particulate Emission Limitations)

This source is located in Vanderburgh, which is listed in 326 IAC 6-1-16, but the source is not specifically listed in 326 IAC 6-1-17. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1-2 are applicable.

- (a) Pursuant to 326 IAC 6-1-2(a), particulate matter (PM) emissions from the fifteen (15) spray paint booths (EU 3, 8-11, 14-18, 20, 24, 5, 6 and 22) shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

The dry filters shall be in operation at all times that the fifteen (15) spray paint booths are in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-1-2(a), the particulate matter emissions from the three (3) pneumatic blast booths (EU 28, EU 29 and EU 30) and the two (2) wheelabrator mechanical blast booths (EU 1 and EU 2) shall each be limited to 0.03 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate allowable emission rate of the following:

Emission Unit	Exhaust Flow Rate (acfm)	Allowable PM Emissions (326 IAC 6-1-2) (lb/hr)
EU 28	800	0.21
EU 29	820	0.21
EU 30	820	0.21
EU 1	1700	0.44
EU 2	1700	0.44

The controlled particulate matter emission rate of 0.00237 pound per hour each, from the blast booths (EU 28 and EU 29) and 0.00424 pound per hour from the blast booth (EU 30) are less than the allowable emission rate of 0.21 pound per hour for each unit, therefore, these facilities are in compliance with the rule 326 IAC 6-1-2. The three (3) baghouses shall be in operation at all times the respective pneumatic blast booths are in operation, in order to comply with this limit.

The uncontrolled particulate matter emission rate of 0.04 pound per hour each, from the two wheelabrator booths (EU 1 and EU 2) is less than the allowable emission rate of 0.44 pound per hour for each unit, therefore, these facilities are in compliance with the rule 326 IAC 6-1-2.

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators are designed with a grain loading of less than or equal to 0.03 grains per actual cubic foot. Therefore, they are in compliance with this rule.

These limits are necessary to make the requirements of 326 IAC 2-7 and 326 IAC 2-2 not applicable.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Limitations established at 326 IAC 6-3 do not apply if limitations established at 326 IAC 6-1 or 326 IAC 12 apply. Since the requirements of 326 IAC 6-1 apply to this source, 326 IAC 6-3 is not applicable.

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

This rule applies to facilities constructed after November 1, 1980. Booths EU 5 (constructed in 1975), EU 8-11 (all constructed in 1972) are not subject to the requirements of this rule because they were constructed prior to the November 1, 1980 rule applicability date.

Booths EU 3 (constructed in 1988), EU 6 (constructed in 1990), EU 14-18 (all constructed in 1984), EU 20 (constructed in 1983), EU 22 (constructed in 1988) and EU 24 (constructed in 1983) are subject to this rule because they were constructed after the November 1, 1980 rule applicability date and each has unlimited potential VOC emissions of greater than 25 tpy.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at spray booths EU 3, EU 6, EU 14-18, EU 20, EU 22 and EU 24 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried 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 information provided by the source, the source is in compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating) when coating metal parts.

326 IAC 8-3-3 (Open Top Vapor Degreaser Operations)

This rule applies to existing facilities as of January 1, 1980, performing organic solvent cleaning operations located in Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph Counties and which are located at sources which have potential emissions of ninety and seven-tenths (90.7) megagrams (one hundred (100) tons) or greater per year of VOC, or to new facilities after January 1, 1980, performing organic solvent degreasing operations located anywhere in state. The open top vapor degreaser for this source, located in Vanderburgh County, was installed in 1988. Therefore, pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreaser Operations) for open top vapor degreasing operations, the owner or operator shall:

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:
 - (1) Racking parts to allow complete drainage;
 - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
 - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) Tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control)

This rule is applicable to the following facilities performing organic solvent degreasing operations located in Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph Counties existing as of July 1, 1990:

- (a) Cold cleaner degreasers without remote solvent reservoirs.
- (b) Open top vapor degreasers with an air to solvent interface of one (1) square meter (ten and eight-tenths (10.8) square feet) or greater.
- (c) Conveyorized degreasers with an air to solvent interface of two (2) square meters (twenty-one and six-tenths (21.6) square feet) or greater.

Or,

Any new facility, construction of which commences after July 1, 1990, of the types described above located in any county.

The open top vapor degreaser for this source, located in Vanderburgh County was constructed in 1988, prior to the rule applicability date, and has an air to solvent interface of eight and nine-tenths (8.9) square feet (less than the specified 10.8 square feet). Therefore, the requirements of this rule do not apply to the open top vapor degreaser located at this source.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is located in Vanderburgh County and, as a FESOP source, shall limit total VOC to less than 100 tons per year. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Vanderburgh County. Therefore, this rule is not applicable to this source.

There are no other 326 IAC 8 rules that apply.

Testing Requirements

Testing is not required for this source because the overspray from the coating operations is controlled by dry filters with controlled emissions well below the allowable particulate matter emission rates, and related VOC and volatile organic HAP (VHAP) emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation.

Compliance Requirements

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

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

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

- (1) The fifteen (15) spray paint booths (EU 3, 8-11, 14-18, 20, 24, 5, 6 and 22) have 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 surface coating booth stacks (V3, S6, S7, S8, S11, S14, S15, S16, S17, S18, S22, S26, S1, S2 and S24) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, 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 Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

These monitoring conditions are necessary because the dry filters for the surface coating facilities must operate properly to ensure compliance with 326 IAC 5-1 (Opacity), 326 IAC 6-1-2 (Particulate Emission Limitations), and 326 IAC 2-8-4 (FESOP).

- (2) The open top vapor degreaser has applicable compliance monitoring conditions as specified below:
 - (a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraph(s) below:
 - (i) The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket of the freeboard refrigeration device, during the idling mode.
 - (b) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified in paragraph below:
 - (i) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
 - (c) The Permittee shall monitor the hoist speed as described below:
 - (i) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
 - (ii) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
 - (iii) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
 - (iv) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

These monitoring conditions are necessary because the open top vapor degreaser must operate properly to ensure compliance with 326 IAC 8-3-3 (Open Top Vapor Degreaser Operations) and 326 IAC 2-8-4 (FESOP).

- (3) The three pneumatic (3) blast booths (EU 28, EU 29 and EU 30), have applicable compliance monitoring conditions as specified below:
- (a) Visible emission notations of the pneumatic blast booths stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.
 - (f) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the pneumatic blast booths, at least once per shift when the pneumatic blast booths are in operation when venting to the atmosphere. When or any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 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 -Preparation, Implementation, Records, and Reports. 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 and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.
 - (g) An inspection shall be performed each calendar quarter of all bags controlling the process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

- (h) In the event that bag failure has been observed:
- (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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 baghouses for the pneumatic blast booths must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Emission Limitations) and 326 IAC 2-7 (Part 70) and to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Conclusion

The renewed operation of this surface coating operation shall be subject to the conditions of the attached proposed FESOP No.: F163-15006-00024.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: Craddock Finishing, Inc.
Source Location: 1400 W. Illinois St., Evansville, Indiana 47710
County: Vanderburgh
SIC Code: 3479
Operation Permit No.: F163-15006-00024
Permit Reviewer: Seema Roy / EVP

On November 15, 2003, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Craddock Finishing, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a surface coating source. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit renewal 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 renewal should be issued as proposed.

On December 15, 2003, Eric T. Parsley of Commonwealth Engineers, Inc. submitted comments on behalf of Craddock Finishing, Inc. on the proposed FESOP Renewal. The summary of the comments is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment #1

Condition D.1.1 – 326 IAC 8-2-9 Applicability

Booth EU22 should not be included in this condition. According to the applicability criteria in 326 IAC 8-2-1(2), section 9 of this rule is only applicable to facilities constructed after November 1, 1980 with potential emissions of twenty-five (25) tons per year or greater of VOC. The potential to emit from booth EU22 is 3.14 tons per year of VOC (*see page 9 of TSD App. A*).

Response #1

After reviewing the emission calculations, OAQ has decided to remove EU 22 from the requirements of 326 IAC 8-2-9 and conditions D.1.1 and D.1.2 have been revised as follows:

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge from spray booths EU 3, EU 6, EU 14-18, EU 20, ~~EU 22~~ and EU 24 into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for forced air dried coatings.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of spray booths EU 3, EU 6, EU 14-18, EU 20, ~~EU 22~~ and EU 24 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Comment #2

Condition D.1.5 establishes a PM10 limit for the surface coating booths. The PM10 limit is converted to a solids input limit based on the transfer efficiency and control efficiency of each booth. The derived solids input limit is greater than the maximum capacity of the equipment. Therefore, it is pointless to monitor the solids input rate since the emission units cannot exceed the limit. This would be an unnecessary burden for Craddock Finishing.

The conversion demonstrates that if the control equipment operates properly, the emission units comply with the PM10 limit. A review of other permits written by the IDEM reveals that, in this situation, permit language typically; (1) indicates the PM10 limit in the Emission Limit Standards Section, (2) includes a requirement in the Compliance Determination Section that the control equipment be in operation at all times, and (3) includes appropriate monitoring of the control equipment in the Compliance Monitoring Section.

This is consistent with requirements observed in other permits written by the IDEM in the last 90 days for similar emission units and with the format of section D.3. None of the other permits we reviewed with paint spray booths required solids tracking as proposed in this draft permit.

We request the following changes to section D.1:

1. Change D.1.5 to read as follows:

D.1.5 PM₁₀ Emission Limitation [326 IAC 2-8-4][326 IAC 2-2]

The allowable PM₁₀ emissions from the fifteen (15) paint spray booths (EU 3, 8-11, 14-18, 20, 24, 5, 6, and 22) shall be limited to 22.09 pounds per hour. This is equivalent to 96.74 tons of PM₁₀ per twelve (12) consecutive month period, based on 8,760 hours of operation. Compliance with these limitations shall limit the source-wide potential to emit of PM₁₀ to less than 100 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-7 (Part 70) are not applicable. Compliance with these requirements shall also make the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) not applicable.

2. Change D.1.9 to include compliance with 326 IAC 2-8-4 and 326 IAC 2-2.

Response #2

In place of a solids input limit to comply with 326 IAC 2-8-4 (FESOP) and to render the requirements of 326 IAC 2-2 (PSD) not applicable, IDEM, OAQ has agreed to include individual PM10 emission limits, in pounds per hour, for each of the stacks for the fifteen (15) paint spray booths. The emission limits for the spray booths were established by subtracting the potential PM-10 emissions (39.66 tons per year) from the pneumatic blast booths and the potential PM-10 emissions (0.5 ton per year) from the natural gas combustion activities from the source-wide 99.9 tons per year limit leaving a remainder of 59.74 tons per year for the spray booths. Condition D.1.5 has been revised to include the new limits as follows:

D.1.5 PM₁₀ Emission Limitation [326 IAC 2-8-4][326 IAC 2-2]

~~The total solids input to the applicators of the fifteen (15) spray booths, based on 50% transfer efficiency of the air atomization spray gun booths and 75% transfer efficiency of the HVLP spray gun booths, and 90% control efficiency of the dry filters shall be limited as follows:~~

$$A + \frac{1}{2} B < 1934.8 \text{ tpy}$$

where:

~~A = Total solids input at the air atomized air spray guns
B = Total solids input at the HVLP spray guns~~

~~Therefore, the total solids input at the air atomized spray gun booths and half of the total solids input at the HVLP spray gun booths shall not exceed 1934.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This condition, in conjunction with the limit of Condition D.3.2, will limit the potential to emit PM₁₀ to less than 100 tons per year from the entire source and make the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) not applicable. PM is assumed equal to PM-10. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) is not applicable for PM emissions either.~~

The allowable PM₁₀ emissions from the fifteen (15) paint spray booths (EU 3, 8-11, 14-18, 20, 24, 5, 6, and 22) shall be limited as follows:

Booths	Stack ID	Limit (lbs/hr)
EU 3	V3	0.26
EU 5	S1	0.06
EU 6	S2	0.22
EU 8-11	S6, S7, S8, S11	4.69
EU14-18	S14, S15, S16, S17, S18	3.66
EU 20	S22	4.49
EU 22	S24	0.01
EU 24	S26	0.26

Compliance with these limitations shall limit the source-wide potential to emit of PM₁₀ to less than 100 tons per year. Therefore the requirements of 326 IAC 2-7 (Part 70) are not applicable. Compliance with these requirements shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) not applicable.

Consequently, the FESOP Quarterly Report (III) has been removed from the permit as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY**

COMPLIANCE DATA SECTION

FESOP Quarterly Report (III)

Source Name: Craddock Finishing, Inc.
 Source Address: 1400 W. Illinois St., Evansville, Indiana 47710
 Mailing Address: P.O. Box 269, Evansville, Indiana 47702-0269
 FESOP No.: F163-15006-00024
 Facility: Fifteen (15) spray paint booths
 Parameter: PM/PM10
 Limit: The total solids input to the applicators of the fifteen (15) spray booths, based on 50% transfer efficiency of the air atomization spray gun booths and 75% transfer efficiency of the HVLP spray gun booths, and 90% control efficiency of the dry filters shall be limited as follows:

$$\text{Total Solids Input} = A (1 - 0.5) (1 - 0.9) + B (1 - 0.75) (1 - 0.9) \leq 96.74 \text{ tpy}$$

where:

- A = Total solids input at the air atomized air spray guns
- B = Total solids input at the HVLP spray guns

YEAR:

Month	A (tons)	B (tons)	Total Solid Input This Month (tons) A (1 - 0.5) (1 - 0.9) + B (1 - 0.75) (1 - 0.9)	Total Solid Input Previous 11 Months (tons)	Total 12-Month Solid Input (tons)
Month 1					
Month 2					
Month 3					

A: Total solid Input at air atomization at paint booths EU 3, EU 8, EU 11, EU 14, EU 18, EU 20 and EU 24.

B: Total solid Input at HVLP at paint booths EU 5, EU 6 and EU 22.

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

Condition D.1.11 has been revised as follows:

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.3 and D.1.4 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.1, D.1.3 and D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each month;
 - (4) The total individual and combined HAP usage for each month;
 - (5) The weight of VOCs emitted for each compliance period; and
 - (6) The weight of total individual and combined HAPs emitted for each compliance period.
- ~~(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the amounts of solids delivered to the applicators for each month.~~
- ~~(e)~~**(b)** To document compliance with Condition D.1.10, the Permittee shall maintain a log of daily overspray observations, once per shift and weekly inspections **filter inspections, a log of weekly observations for overspray from surface coating booth stacks while one or more stacks are in operation, a log of monthly inspections of coating emissions from the stack and the presence of overspray on roof tops and nearby ground,** and those additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(d)~~**(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Condition D.1.12 has been revised as follows:

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3, **and** D.1.4 ~~and D.1.5~~ shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Condition D.1.9 has also been revised to include reference to the specific permit conditions that the dry filters are required to comply with and to include the rule cites for FESOP (326 IAC 2-8-4) and 326 IAC 2-2 for the PSD minor limit as follows:

D.1.9 Particulate Control [326 IAC 6-1-2] [326 IAC 2-8-4] [326 IAC 2-2]

In order to comply with ~~326 IAC 6-1-2(a)~~ **Conditions D.1.5 and D.1.6**, the dry filters for particulate control shall be in ~~operation~~ **place** and control emissions from the from the fifteen (15) paint spray booths (EU 3, 8-11, 14-18, 20, 24, 5, 6 and 22) at all times that the fifteen (15) paint spray booths are in operation.

Comment #3

Section D.3 – Insignificant Activities EU 28, 29, 30, 1, and 2

Each of the emission units subject to section D.3 is listed as an insignificant activity. The total controlled potential to emit from all of the units combined is less than 0.1 pounds per hour, or 0.4 tons per year based on 8,760 hours. The requirements of section D.3 are excessive for emission units that are deemed insignificant with such low emissions. Section D.3 also requires pressure gauge monitoring for control devices that are not equipped with gauges. We request that the Compliance Monitoring and Record Keeping and Reporting requirements in section D.3 be removed.

Response #3

Since each of the three (3) pneumatic blast booths (EU 28, EU 29 and EU 30) need a control device, i.e. a baghouse, to be in compliance with 326 IAC 6-1-2 (Particulate Emission Limitations) and 326 IAC 2-8-4 (FESOP), compliance monitoring is necessary to ensure that these units are complying with the 326 IAC 6-1-2 and FESOP limits. Therefore, no change has been made as a result of this comment. However, because the baghouses controlling particulate emissions from the three (3) blast booths are needed to comply with the limits pursuant to 326 IAC 6-1-2 and 326 IAC 2-8-4, a new condition D.3.4 has been added as a Compliance Determination Condition requiring the baghouses to be operated at all times the blast booths are in operation. The remaining conditions in section D.3 have been re-numbered accordingly. Also, the equipment descriptions for the two (2) Wheelabrator blast booths, EU1 and EU2, have been added to the facility description box for section D.3 since there is an applicable emission limit for these units pursuant to 326 IAC 6-1-2. Finally, IDEM, OAQ has determined that a compliance monitoring frequency of once per day is sufficient to demonstrate compliance for this FESOP source. Conditions D.3.4 (now re-numbered D.3.5), D.3.5 (now re-numbered D.3.6), and D.3.8(a) and (b) (now re-numbered D.3.9(a) and (b)) have been revised accordingly.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (e) Three (3) pneumatic blast booths identified as EU 28, 29, and 30, constructed in 1994, 1991 and 1992 respectively, each with a baghouse for particulate matter control, each exhausting through one (1) stack respectively identified as V7, V8 and V9.
- (c) **Two (2) Wheelabrator mechanical blast booths identified as EU 1 and 2, with a baghouse for particulate matter control.**

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

Compliance Determination Requirements

D.3.4 Particulate Control [326 IAC 6-1-2] [326 IAC 2-8-4] [326 IAC 2-2]

In order to comply with Conditions D.3.1 and D.3.2, the three (3) baghouses for particulate control shall be in operation and control emissions from the three (3) pneumatic blast booths (EU 28, EU 29, and EU 30) at all times that the three (3) pneumatic blast booths are in operation.

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

D.3.45 Visible Emissions Notations

- (a) Visible emission notations of the pneumatic blast booths stack exhausts shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

D.3.56 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the pneumatic blast booths, at least once per ~~shift~~ **day** when the pneumatic blast booths are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 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 -Preparation, Implementation, Records, and Reports. 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~~ **deviation from** this permit.

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

D.3.89 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations of the pneumatic blast booths stack exhausts once per ~~shift~~ **day**.

- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records once per ~~shift~~ **day** of the total static pressure drop during normal operation when venting to the atmosphere.

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Throughout the permit, the Evansville Environmental Protection Agency (EEPA) address has been corrected as follows:

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

Also, the address for IDEM, OAQ has been updated as follows:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana 46204-6015

2. Throughout the permit, to prevent confusion with the U.S. EPA, Evansville EPA has been replaced with EEPA.
3. On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Vanderburgh County has been designated as nonattainment for the 8-hour ozone standard. Also, U.S.EPA, in Federal Register Notice 70 FR 943, dated January 5, 2005, has designated Vanderburgh County as nonattainment for PM2.5. The designation became effective on April 5, 2005. Therefore, section A.1, General Information, has been revised to include these designations.

Also, the 8 hour ozone nonattainment designations in 69 FR 23858 have been incorporated in 326 IAC 1-4-1 effective December 12, 2004. Therefore provisions of 326 IAC 2-3 are applicable in these areas. IDEM has added the appropriate term in section A.1 for Emission Offset (326 IAC 2-3) as follows:

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

The Permittee owns and operates a stationary surface coating operation.

Authorized Individual:	President
Source Address:	1400 W. Illinois St., Evansville, Indiana 47710
Mailing Address:	P.O. Box 269, Evansville, Indiana 47702-0269
General Source Phone:	(812) 425-2691
SIC Code:	3479
Source Location Status:	Vanderburgh Nonattainment for ozone under the 8-hour standard Nonattainment for PM2.5
Source Status:	Attainment for all other criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules and Emission Offset Rules

and Nonattainment NSR;
Minor Source, Section 112 of the Clean Air Act

The following changes were made to conditions D.1.3 and D.2.3 to clarify that the VOC limits are also making the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2] [326 IAC 2-3]

The total VOC usage at the fifteen (15) spray paint booths, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 90.94 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

Compliance with this limitation shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with this condition shall also make the requirements of 326 IAC 2-2 (PSD) **and 326 IAC 2-3 (Emission Offset)** not applicable to the source.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-3]

Pursuant to 326 IAC 2-8-4, the amount of VOCs delivered to the open top vapor degreaser shall be limited to 8.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than 100 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 (**Part 70**), ~~and~~ 326 IAC 2-2 (**PSD**), **and 326 IAC 2-3 (Emission Offset)** not applicable.

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard and PM2.5 standard designations. The county attainment status regarding other pollutants remains unchanged; therefore will not be shown below other than in the table.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM2.5	Nonattainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
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. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.~~
- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.**
- (b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Vanderburgh County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements.**

4. Condition B.10 (Compliance with Permit Conditions) has been removed from the B section and has been added to the FESOP cover page instead.

~~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. (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.~~

The following statement has been added to the FESOP cover page:

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. 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.

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.

5. A statement was added to B.11, now re-numbered as B.10, Certification in order to clarify that the certification form may cover more than one document that is submitted.

B.140 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. **One (1) certification may cover multiple forms in one (1) submittal.**
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).
6. In condition B.14 (b)(4) (now re-numbered as B.13 (b)(4)) a reference to the Southwest Regional Office, including the phone number, has been included and the EEPA phone number has been changed as follows:

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA), **and IDEM Southwest Regional Office** 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.: ~~842-426-5597~~ **812-435-6145** (Evansville EEPA)

Facsimile No.: ~~842-426-5654~~ **812-435-6155** (Evansville EEPA)

Telephone No.: 812-380-2305 (IDEM Southwest Regional Office)

Telephone No.: 1-888-672-8323 (Toll free within Indiana)

Facsimile No.: 812-380-2304 (IDEM Southwest Regional Office)

7. The table of contents has been revised to include rule cite [IC 13-17-3-2] in the Inspection and Entry Section as follows:

B.240 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC13-14-2-2][IC 13-30-3-1][**IC 13-17-3-2**]

8. The section and phone number of whom the Permittee can contact has been corrected in (c) of Condition B.23, now re-numbered as B.22.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or **317-233-4320** (ask for OAQ, ~~IM &~~ Billing, **Licensing, and Training** Section), to determine the appropriate permit fee.

9. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into the permit as follows:

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

10. Condition C.2 has been revised to include reference to 326 IAC 2-2 (PSD) in paragraph (a)(1) as follows:

C.2 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. This limitation shall also ~~satisfy~~ **make** the requirements of **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))** and 326 IAC 2-3 (Emission Offset) **not applicable**;

11. Condition C.10(c), Performance Testing, has been revised as follows:

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and Evansville Environmental Protection Agency (EEPA) not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, **and Evansville Environmental Protection Agency (EEPA)** if the ~~source~~ **Permittee** 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.

12. Condition C.13 has been revised as follows:

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.

13. Condition C.15, Risk Management Plan, has been revised as follows:

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.245]

If a regulated substance as defined in 40 CFR 68, is present at a source in more than a threshold quantity, ~~source the Permittee~~ must comply with the applicable requirements of 40 CFR 68.

14. The notification requirement in Condition C.16 (b)(3) has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements. Condition C.16 (b)(3) has been revised as follows:

(b)(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.~~

If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

15. Since this source is complying with 326 IAC 2-8 (FESOP) and is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is not subject to 326 IAC 2-6 (Emission Reporting). Therefore, Condition C.18, Emission Statement, has been removed from the permit as follows and the remaining condition numbers have been changed accordingly. The table of contents has also been revised.

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

(a) ~~The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:~~

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

and

~~Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713~~

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

- ~~(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA), on or before the date it is due.~~

16. Condition C.20, now re-numbered as C.19, General Reporting requirements, has been revised as follows. Clarification of what calendar year means has been added to (e).

C.2019 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Evansville Environmental Protection Agency (EEPA)
Ste. 100, C.K. Newsome Community Center
100 East Walnut Street
Evansville, IN 47713

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Evansville Environmental Protection Agency (EEPA) on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do 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, **unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.**

17. Condition D.1.10, Monitoring, and condition D.3.7, now re-numbered as D.3.8, have been revised as follows:

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (V3, S6, S7, S8, S11, S14, S15, S16, S17, S18, S22, S26, S1, S2 and S24) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a ~~violation~~ of **deviation from** 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 Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a ~~violation~~ of **deviation from** this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.3.78 Broken or Failed Bag Detection

In the event that bag 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. 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation~~ of **deviation from** this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then 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).

18. The numbering in Condition D.2.2 (a) has been revised as follows:

- (a) Pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:
- (1) The cleaning machine shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
 - (2) The cleaning machine shall be employed with a control combination of working mode cover and freeboard refrigeration device.
 - ~~(4)~~ **(3)** Cleaning machine shall have a freeboard ratio of 0.75 or greater.
19. Condition D.2.9 (b)(1) has been revised as follows:
- (1) The results of control device monitoring required under **Condition D.2.8** and 40 CFR 63.466.
20. Condition D.2.9 (c)(2) has been deleted as it does not have a regulatory basis and does not aid in documenting compliance with either D.2.3 or D.2.4. Also, the D.2.9 (e) has been changed as D.2.9 (d) to revise the numbering system:
- ~~(2)~~ — A log of the dates of use;
- ~~(3)~~ **(2)** The volume weighted VOC and HAP content of the halogenated solvent used for each month;
- ~~(4)~~ **(3)** The weight of VOC and HAP emitted for each compliance period.
- ~~(e)~~ **(d)** These records shall be maintained in accordance with Section C - General Record Keeping Requirements.
21. Condition D.2.10 (a) has been revised to include the Annual Report required by 40 CFR 63.468(f) and the Semi-Annual Report required by 40 CFR 63.468(h) as follows:

D.2.10 Reporting Requirements

- (a) A summary of the information to document compliance with Condition D.2.1 **and the annual report required under 40 CFR 63.468(f) and the semi-annual report required under 40 CFR 63.468(h)** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:
- United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
22. A VOC reporting form for the open top vapor degreaser has been included as follows:

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

And

EVANSVILLE EPA

FESOP Quarterly Report (III)

Source Name: Craddock Finishing, Inc.
Source Address: 1400 W. Illinois St., Evansville, Indiana 47710
Mailing Address: P.O. Box 269, Evansville, Indiana 47702-0269
FESOP No.: F163-15006-00024
Facility: one (1) open top vapor degreaser
Parameter: VOC
Limit: the VOC usage at the open top vapor degreaser shall be limited to 8.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Total Input Usage This Month (tons)	Total Input Usage Previous 11 Months (tons)	Total 12-Month Input Usage (tons)
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

23. The Evansville EPA has been added to the headings of the FESOP Certification form, the FESOP Emergency Occurrence Report form, the Quarterly Report forms, and the Quarterly Deviation and Compliance Monitoring Report form.
24. The third sentence on the Quarterly Deviation and Compliance Monitoring report form has been replaced with the sentence that is consistent with the condition in Section B Deviations from Permit Requirements and Conditions.

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.~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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".

On May 27, 2005, Eric T. Parsley of Commonwealth Engineers, Inc. submitted additional comments on behalf of Craddock Finishing, Inc. on the proposed FESOP Renewal. The summary of the comments is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment #1

EEPA Comments

In a certified letter dated December 11, 2003, the Evansville EPA submitted written comments on the November 2003 draft permit issued for this facility. Since these comments have an impact on Craddock's permit, please provide a copy of the IDEM/EVP responses to each of the comments submitted by the EEPA.

Response #1

The comments submitted by the Evansville EPA which were received by the OAQ on December 15, 2003, were all addressed in the changes documented in this addendum but were not specifically listed in a comment/response format. The general comments that were typographical in nature were addressed in the changes made by the OAQ listed as items 1 through 24 above. Other changes were included in the responses to the original comments submitted by Eric Parsley such as the changes to conditions D.1.9 and D.1.11 included in Response #2. Additionally, the emission calculation spreadsheet for surface coating was revised to indicate which coatings are for coating non-metal parts and which are for metal parts to show compliance with 326 IAC 8-2-9 more clearly.

The following discussion includes EEPA comments that did not result in any changes to the permit and responses explaining why the permit was not revised.

EEPA Comment

The EEPA comment stated that Vanderburgh County was classified as attainment for all criteria pollutants, and is therefore subject to 326 IAC 2-2 (PSD) instead of 326 IAC 2-3 (Emission Offset) and that condition C.2 should be revised to reflect this.

Response

At the time that the EEPA made this comment, this was true for Vanderburgh County. However, as stated in item 3 of the changes made by the OAQ above, Vanderburgh County has since been classified as nonattainment for ozone under the 8-hour standard and nonattainment for PM2.5. Therefore, the reference to 326 IAC 2-3 (Emission Offset) remains in condition C.2. See item 10 of the changes made by the OAQ above for additional revisions to condition C.2.

EEPA Comment

EEPA suggested alternate language for condition C.12 of the permit allowing the source up to ninety (90) days of permit issuance to implement all monitoring and record keeping requirements.

Response

On March 8, 2004, the Director of EEPA, Dona Bergman, subsequently submitted a clarification of the comments submitted on December 15, 2003 which included a statement to disregard the EEPA's comment on this condition since they agreed that the source did not need additional time for compliance.

EEPA Comment

EEPA suggested that condition D.1.5 be deleted from the permit since they did not feel this was an effective method of limited PM10 emissions.

Response

Condition D.1.5 was not deleted from the permit because the source has an uncontrolled PTE for paint overspray of 620.2 tons per year and 62.0 tons per year after control. Since there is no restriction on paint formulations and they can vary, an enforceable limitation with documentation is required. Condition D.1.5 was instead revised as shown in Response #2 to the original comments submitted by Eric Parsley above.

EEPA Comment

EEPA stated that condition D.3.1 erroneously included the Wheelabrator blast booths, which are insignificant activities.

Response

The Wheelabrator blast booths are not exempt from the particulate emission limits pursuant to 326 IAC 6-1-2 because they are insignificant activities. The entire source is subject to the rule and there is nothing in the rule that exempts insignificant activities which emit particulate matter from this rule. Therefore, these units must be included in condition D.3.1.

EEPA Comment

The EEPA commented that conditions D.3.4(a), D.3.5, D.3.6, D.3.7 and D.3.8 be deleted from the permit since the pneumatic blast booths do not exhaust to the outside and the person operating the blast booth is able to visually verify that the blast booths are operating properly and are not emitting particulate into the facility.

Response

No change was made to the permit because the source is taking synthetic limits for PM to render the requirements of 326 IAC 2-2 (PSD) not applicable and the baghouses are required for the pneumatic blast booths to comply with these limits and to comply with the particulate matter emission limits pursuant to 326 IAC 6-1-2 and the PM10 emission limits pursuant to 326 IAC 2-8-4 (FESOP) which apply to the pneumatic blast booths. Therefore, compliance monitoring is necessary to determine whether the baghouses are operating properly and to determine whether the pneumatic blast booths are complying with the applicable PM and PM10 emission limits.

Comment #2

Condition D.1.5 Spray Booth PM-10 hourly limit

To limit source wide PM-10 emissions below FESOP levels, the subject booths are limited to a total of 59.74 tons PM-10 per **year**. This limit is divided among each booth based on a weighted percentage of potential emissions from the subject booths. The limit is further deduced into an hourly limit based on operating 8,760 hours per year. Since the booths operate substantially less than 8,760 hours per year, it would be possible for them to deviate from the **hourly** permit limit, but remain in compliance by not exceeding the FESOP **annual** limit. To avoid potential confusion with respect to compliance, Craddock would prefer an annual, per booth limit in tons per year.

Response #2

In order for emission limits to be enforceable as a practical matter, they must be in a form that is verifiable by stack testing if necessary. Therefore, the emission limits in condition D.1.5 must be short term limits in pounds per hour in order to be enforceable. Therefore, no further changes were made to this condition.

Comment #3

Section D.3 Mechanical Blast Booths

According to 327 IAC 2-7-1(21), the two (2) Wheelabrator mechanical blast booths (EU1 & EU2) are insignificant activities. They are correctly listed as such in Condition A.3(c). In response to our December 2003 comment requesting that these units not be subject to monitoring requirements outlined in section D.3, IDEM/EVP responded that since a control device is necessary for compliance, monitoring is required. This is inconsistent with the previous permit. While it is true that the control device is necessary for compliance with the applicable requirements, the insignificant status of this operation does not justify or support the need for monitoring. These units do not have a reasonable potential to exceed the permit limits. Requiring daily monitoring and record keeping is in conflict with the designation of this activity as insignificant in 326 IAC 2-7-1(21). We are requesting that the monitoring requirements for insignificant activities be deleted.

Response #3

The compliance monitoring requirements in section D.3 only apply to the pneumatic blast booths EU 28, EU 29, and EU 30. The reason for the compliance monitoring requirements for those units is included in Response #3 to the original comments submitted by Eric Parsley. Insignificant activities can be subject to compliance monitoring requirements if they meet any of the criteria requiring monitoring. There are no compliance monitoring requirements for the Wheelabrator mechanical blast booths (EU1 & EU2) because the baghouse is not required to comply with the applicable particulate matter emission limit pursuant to 326 IAC 6-1-2. No changes have been made to the permit as a result of this comment.

Comment #4

D.3.6 Parametric Monitoring

This section requires parametric monitoring for units that are NOT equipped with pressure gauges. If it is IDEM/EVP's intent to keep this condition in the permit, please cite the regulation that requires pressure gauges to be installed on baghouses for compliance monitoring to justify the expense that will be incurred to make the improvements.

Response #4

Compliance monitoring requirements can not be removed from the permit because pressure gauges are not installed on the baghouse. The reason for the compliance monitoring requirements for the three (3) baghouses controlling the pneumatic blast booths EU 28, EU 29, and EU 30 is included in Response #3 to the original comments submitted by Eric Parsley. Pursuant to 326 IAC 2-8-4(3), each FESOP shall include "monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements". Pursuant to 326 IAC 2-8-5(a)(1), each FESOP shall contain "Compliance certification, testing, monitoring, reporting, and record keeping requirements sufficient to assure compliance with the terms and conditions of the FESOP". The parametric monitoring requirement for the baghouses are necessary to ensure that the baghouses are operating properly so that the pneumatic blast booths are in compliance with the PM and PM10 emission limits pursuant to 326 IAC 6-1-2 and 326 IAC 2-8-4. No changes have been made to the permit as a result of this comment.

Appendix A: Emission Calculations

Company Name: Craddock Finishing, Inc.
Address City IN Zip: 1400 W. Illinois St., Evansville, IN 47710
FESOP Renewal: 163-15006-00024
Reviewer: Seema Roy
Date: July 21, 2002

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Natural Gas Combustion	Degreasing Operation	Abrasive Blasting	Surface Coating Operation	TOTAL
PM	0.10	negl.	39.66	620.16	659.9
PM10	0.50	negl.	39.66	620.16	660.3
SO2	negl.	negl.	negl.	negl.	negl.
NOx	6.20	negl.	negl.	negl.	6.2
VOC	0.30	8.76	negl.	823.01	832.1
CO	5.20	negl.	negl.	negl.	5.2
total HAPs	negl.	8.76	negl.	74.64	83.4
worst case single HAP	negl.	8.76	negl.	42.22	51.0

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Natural Gas Combustion	Degreasing Operation	Abrasive Blasting	Surface Coating Operation	TOTAL
PM	0.10	negl.	0.01	12.40	12.5
PM10	0.50	negl.	0.01	12.40	12.9
SO2	negl.	negl.	negl.	negl.	negl.
NOx	6.20	negl.	negl.	negl.	6.2
VOC	0.30	8.76	negl.	less than 90.94	less than 100
CO	5.20	negl.	negl.	negl.	5.2
total HAPs	negl.	8.76	negl.	less than 16.24	less than 25
worst case single HAP	negl.	8.76	negl.	less than 10	less than 10

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Paint Drying Ovens

HAPs Emissions

Company Name: Craddock Finishing, Inc.
Address City IN Zip: 1400 W. Illinois St., Evansville, IN 47710
FESOP Renewal: 163-15006-00024
Reviewer: Seema Roy
Date: July 17, 2002

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.302E-04	7.437E-05	4.648E-03	1.116E-01	2.107E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.099E-05	6.817E-05	8.677E-05	2.355E-05	1.302E-04

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations

Abrasive Blasting

Company Name: Craddock Finishing, Inc.
Address City IN Zip: 1400 W. Illinois St., Evansville, IN 47710
FESOP Renewal: 163-15006-00024
Reviewer: Seema Roy
Date: July 17, 2002

EU ID # 1

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	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Flow Rate (FR) (lb/hr) = 10.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

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

0.004

FR = Flow Rate (lb/hr) =

10.000

w = fraction of time of wet blasting =

0 %

N = number of nozzles =

1

Uncontrolled Emissions =	0.04 lb/hr
	0.18 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

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: Emission Calculations

Abrasive Blasting

Company Name: Craddock Finishing, Inc.
Address City IN Zip: 1400 W. Illinois St., Evansville, IN 47710
FESOP Renewal: 143-15006-00024
Reviewer: Seema Roy
Date: July 18, 2002

EU ID # 2

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	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Flow Rate (FR) (lb/hr) = 10.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

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

0.004

FR = Flow Rate (lb/hr) =

10.000

w = fraction of time of wet blasting =

0%

N = number of nozzles =

1

Uncontrolled Emissions =	0.04 lb/hr
	0.18 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

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: Emission Calculations

Abrasive Blasting

Company Name: Craddock Finishing, Inc.
Address City IN Zip: 1400 W. Illinois St., Evansville, IN 47710
FESOP Renewal: 163-15006-00024
Reviewer: Seema Roy
Date: July 18, 2002

EU ID # 28

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	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

ID1 = Nozzle internal diameter (in) from Table 3 =

221
106
99
0.25
0.25

Flow Rate (FR) (lb/hr) = 236.626 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 =

0.010
236.626
0%
1

Uncontrolled Emissions =	2.37 lb/hr
	10.36 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: Emission Calculations

Abrasive Blasting

Company Name: Craddock Finishing, Inc.
Address City IN Zip: 1400 W. Illinois St., Evansville, IN 47710
FESOP Renewal: 163-15006-00024
Reviewer: Seema Roy
Date: July 18, 2002

EU ID # 29

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	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

ID1 = Nozzle internal diameter (in) from Table 3 =

221
106
99
0.25
0.25

Flow Rate (FR) (lb/hr) = 236.626 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 =

0.010
236.626
0 %
1

Uncontrolled Emissions =	2.37 lb/hr
	10.36 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: Emission Calculations

Abrasive Blasting

Company Name: Craddock Finishing, Inc.
Address City IN Zip: 1400 W. Illinois St., Evansville, IN 47710
FESOP Renewal: 163-15006-00024
Reviewer: Seema Roy
Date: July 18, 2002

EU ID # 30

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	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

221
475
99
0.25
0.25

Flow Rate (FR) (lb/hr) = 1060.354 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
1060.354
0%
1

Uncontrolled Emissions =	4.24 lb/hr
	18.58 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
VOC and Particulate
From Surface Coating Operations**

Company Name: Craddock Finishing, Inc.
Address City IN Zip: 1400 W. Illinois St., Evansville, IN 47710
FESOP Renewal: 163-15006-00024
Reviewer: Seema Roy
Date: July 17, 2002

Process	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	
	Non Metal Coatings																	
EU ID 3+24	#439	12.1	51.41%	0.0%	51.4%	0.0%	41.33%	0.10070	9.000	6.22	6.22	11.28	270.61	49.39	23.34	15.05	50%	
EU ID 5	RR22845	7.9	72.76%	0.0%	72.8%	0.0%	25.74%	0.00500	79.000	5.75	5.75	2.27	54.49	9.94	0.93	22.33	75%	
EU ID 5	FT 22844	10.1	35.12%	0.0%	35.1%	0.0%	63.19%	0.00480	79.000	3.55	3.55	1.35	32.28	5.89	2.72	5.61	75%	
EU ID 6	#45272	9.2	67.21%	40.0%	27.2%	44.3%	32.79%	0.00890	342.000	4.49	2.50	7.62	182.87	33.37	10.05	7.63	75%	
EU ID 8-11	F63VXB-1490	11.4	30.76%	0.0%	30.8%	0.0%	40.67%	0.04740	130.000	3.51	3.51	43.22	1037.18	189.29	213.04	8.62	50%	
EU ID 14-18	PP23909	8.5	63.44%	0.0%	63.4%	0.0%	32.97%	0.08770	97.750	5.39	5.39	115.57	2773.64	506.19	145.86	16.36	50%	
EU ID 14-18	PP20811	8.9	57.91%	0.0%	57.9%	0.0%	37.46%	0.07610	106.600	5.15	5.15	104.53	2508.63	457.83	166.38	13.76	50%	
EU ID 20	PP Primer	7.3	93.00%	0.0%	93.0%	0.0%	7.00%	0.00190	561.000	6.79	6.79	7.24	173.67	31.70	1.19	96.99	50%	
EU ID 20	RW22932	9.2	0.00%	0.0%	0.0%	0.0%	18.30%	0.02000	504.000	0.00	0.00	0.00	0.00	0.00	203.09	0.00	50%	
EU ID 22	#1010/870	9.0	69.00%	0.0%	69.0%	0.0%	20.00%	0.00050	231.000	6.21	6.21	0.72	17.21	3.14	0.35	31.05	75%	
Uncontrolled Potential Emissions											187.89	4509.68	823.01	620.16				
Limited Potential Emissions (tons/yr)													<90.94	62.02				
	Metal Coatings																	
EU ID 3+24	43-31366	9.4	34.30%	0.0%	34.3%	0.0%	44.20%	0.01731	32.000	3.23	3.23	3.58	86.00	15.69	15.03	7.32	50%	
EU ID 5	43-31366	9.4	34.30%	0.0%	34.3%	0.0%	44.20%	0.01731	32.000	3.23	3.23	1.79	43.00	7.85	3.76	7.32	75%	
EU ID 6	43-31366	9.4	34.30%	0.0%	34.3%	0.0%	44.20%	0.01731	32.000	3.23	3.23	1.79	43.00	7.85	3.76	7.32	75%	
EU ID 8-11	43-31366	9.4	34.30%	0.0%	34.3%	0.0%	44.20%	0.01731	65.000	3.23	3.23	7.28	174.69	31.88	30.53	7.32	50%	
EU ID 14-18	43-31366	9.4	34.30%	0.0%	34.3%	0.0%	44.20%	0.01731	65.000	3.23	3.23	9.10	218.36	39.85	38.17	7.32	50%	
EU ID 20	RW22932	9.2	0.00%	0.0%	0.0%	0.0%	18.30%	0.01731	59.000	0.00	0.00	0.00	0.00	0.00	20.58	0.00	50%	
EU ID 22	43-31366	9.4	34.30%	0.0%	34.3%	0.0%	44.20%	0.01731	32.000	3.23	3.23	1.79	43.00	7.85	3.76	7.32	75%	
Uncontrolled Potential Emissions											25.34	608.04	110.97	115.58				

Note:
Control efficiencies for the dry filters for surface coating operation are 98% each.

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
PM/PM10 Input Limit (tons/yr) = Limited Particulate (tons/yr) / [(1-transfer efficiency) * (1 - control efficiency)]

EU ID 3 and 24
These two booths perform common operations, therefore the emissions are multiplied by 2 to obtain the PTE for both booths.

EU ID 8-11
To achieve the output per hour in column # 12 of the PL-19 requires two booths. Since there are four booths on the line, the emissions are multiplied by 2 to obtain the PTE for all four booths.

EU ID 14-18
To achieve the output per hour in column # 12 of the PL-19 requires two booths. Since there are five booths on the line, the emissions are multiplied by 2.5 to obtain the PTE for all five booths.