Mr. Marc Craddock Craddock Finishing Corporation 1400 West Illinois Street P. O. Box 269 Evansville, Indiana 47702-0269

> Re: 163-15835 First Administrative Amendment to FESOP 163-7735-00024

Dear Mr. Craddock:

Craddock Finishing Corporation was issued a FESOP on July 30, 1997 for various plastic and metal parts surface coating operation. A letter requesting a change in the permit was received on April 8, 2002, to install one (1) natural gas-fired paint drying oven with a heat input capacity of 500,000 British thermal units per hour (Btu/hr). This oven which is an insignificant activity (see the attached calculations spreadsheet), qualifies as "revision to descriptive information where revision will not trigger a new applicable requirements or violate a permit term", under Administrative Amendment 326 IAC 2-8-10. Therefore, the amendment is as follows (additions are **bolded** and deletions are **struck-through** for emphasis):

Section A.3 is amended to include one (1) natural gas-fired paint drying oven with a heat input capacity of 500,000 British thermal units per hour (Btu/hr).

A.3 Insignificant Activities

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

- (1) One (1) new natural gas-fired paint drying oven with a heat input capacity of 500,000 British thermal units per hour (Btu/hr)
- (**+ 2**) 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
- (2 3) Two (2) wheelabrator mechanical blast booths identified as EU 1 and 2, with a baghouse for particulate matter control
- (3 4) 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
- (**4 5**) Infrared curing equipment
- (5 6) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment
- (67) 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
- (**78**) Filter or coalescer media changeout
- (89) Two (2) 1000 gallon gasoline tanks handling less than 1300 gallons per day.

Craddock Finishing Corporation Evansville, Indiana Reviewer: Aida De Guzman Page 2 of 2 First Administrative Amendment 163-15835 FESOP No. F163-7735-00024

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

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

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments

APD

cc: File - Vanderburgh County U.S. EPA, Region V Vanderburgh County Health Department Evansville Environmental Protection Agency Southwest Regional Office Air Compliance Section Inspector - Scott Anslinger Compliance Data Section - Karen Nowak Administrative and Development - Janet Mobley Technical Support and Modeling - Michele Boner

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

Craddock Finishing Corp. 1400 W. Illinois St. Evansville, Indiana 47710

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

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

Operation Permit No.: F163-7735-00024						
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: July 30, 1997					
First Administrative Amendment No.: 163-15835	Pages Affected: 4, 5					
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 23, 2002					

SECTION A SOURCE SUMMARY

A.1 <u>General Information</u> The Permittee owns and operates a surface coating operation.

Responsible Official:	Mark Craddock
Source Address:	1400 W. Illinois St., Evansville, Indiana 47710
Mailing Address:	P.O. Box 269, Evansville, Indiana 47702-0269
SIC Code:	3999, 3479
County Location:	Vanderburgh
County Status:	Marginal nonattainment for ozone
	Secondary nonattainment for TSP
	Attainment for all other criteria pollutants
Source Status:	Synthetic Minor Source, FESOP Program

A.2 <u>Emission Units and Pollution Control Summary</u> The stationary source consists of the following emission units and pollution control devices:

- (1) Twelve (12) spray paint booths identified as 3, 8-11, 14-18, 20 and 24. Each booth uses one air atomization spray gun, and is equipped with dry filters for particulate matter control.
- (2) Two (2) spray paint booths identified as EU 5 and 6. Each booth uses one HVLP spray gun, and is equipped with dry filters for particulate matter control.
- (3) One (1) spray booth identified as EU 22. The booth uses one HVLP spray gun, and is equipped with dry filters for particulate matter control.
- (4) One (1) open top vapor degreaser identified as EU 4.
- (5) Three (3) pneumatic blast booths identified as EU 28, 29, and 30, with a baghouse for particulate matter control.

A.3 Insignificant Activities

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

- (1) One (1) new natural gas-fired paint drying oven with a heat input capacity of 500,000 British thermal units per hour (Btu/hr)
- (2) 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
- (3) Two (2) wheelabrator mechanical blast booths identified as EU 1 and 2, with a baghouse for particulate matter control
- (4) 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
- (5) Infrared curing equipment
- (6) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment

- (7) 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
- (8) Filter or coalescer media changeout
- (9) Two (2) 1000 gallon gasoline tanks handling less than 1300 gallons per day.

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 Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

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

	Company Name:	Craddock Finishing Corporation
	Address City IN Zip:	1400 W. Illinois Street, Evansville, IN 47710
	Administrative Amendment No.	163-15835
	Plt ID:	163-00024
1 Paint drying ove	n Reviewer:	Aida De Guzman
	Date Application Received:	April 8, 2002
Heat Input Capaci	ty Potential Throug	hput
MMBtu/hr	MMCF/yr	
0.5	4.4	

Pollutant								
	PM*	PM10*	SO2	NOx	VOC	CO		
Emission Factor in Ib/MMCF	1.9	7.6	0.6	100.0	5.5	84.0		
				**see below				
Potential Emission in tons/yr	0.0	0.0	0.0	0.2	0.0	0.2		

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

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

Methodology

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).