



Joseph E. Kernan  
Governor

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Commissioner

May 20, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
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TO: Interested Parties / Applicant  
RE: Padgett, Inc / 043-16746-00049  
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 9/16/03



Frank O'Bannon  
Governor

Lori F. Kaplan  
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Indianapolis, Indiana 46206-6015  
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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Padgett, Inc.  
901 E. Fourth Street  
New Albany, Indiana 47150**

(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 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.

|   |  |
|---|--|
| Operation Permit No.: F 043-16746-00040   |  |
| Issued by: Original signed by<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: May 20, 2004<br><br>Expiration Date: May 20, 2009 |

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary metal products fabrication source.

Authorized individual: Vice President  
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150  
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151  
General Source Phone: (812) 945-1299  
SIC Code: 3441  
Source Location Status: Floyd County  
Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;  
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)]

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

- (a) One (1) paint booth, identified as EU-01, constructed in 1999, equipped with one (1) airless spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 01 A and B, capacity: 3,600 pounds of metal beams and parts per hour.
- (b) One (1) paint booth, identified as EU-05, constructed in 1983, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 03, 04 and 05, capacity: 3,600 pounds of metal beams and parts per hour.
- (c) One (1) paint booth, identified as EU-07, constructed in 2002, equipped with one (1) airless HVLP spray gun and a built-in dry filter system, exhausting to Stack S/V 07, capacity: 2,500 pounds of metal parts per hour.
- (d) One (1) sand abrasive booth, identified as EU-02, constructed in 1986, equipped with a cartridge dust collector for particulate control and exhausting to Stack S/V 02, capacity: 625 pounds of sand per hour and 16,914 pounds of metal parts per hour.
- (e) One (1) mechanical blast unit, identified as EU-03, constructed in 1999, equipped with a dust collector for particulate control and exhausting inside the building, capacity: 107,500 pounds of shot per hour, and 1,500 pounds of metal parts per hour.

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

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

- (a) Six (6) natural gas-fired paint booth radiant heaters, identified as booth heaters, constructed in 1983, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.

- (b) Eight (8) natural gas-fired main shop radiant heaters, identified as shop heaters, four (4) constructed in 1983 and four (4) constructed in 1995, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.
- (c) Twenty-five (25) MIG welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 10.31 pounds of wire per hour, each.
- (d) One (1) TIG welding station, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.33 pounds of wire per hour.
- (e) Three (3) stick welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.08 pounds of wire per hour, each.
- (f) One (1) flame cutting plasma table, constructed in 2001, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 5.0 inches, capacity: six (6) inches per minute.
- (g) Thirteen (13) oxyacetylene flame-cutting stations, constructed in 1986, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 0.5 inches, capacity: 1.2 inches per minute, each.

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]

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

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(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 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.
- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

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

B.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, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or 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, 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
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**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]**

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

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(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 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

|                      |
|----------------------|
| <b>Entire Source</b> |
|----------------------|

### 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] [326 IAC 2-2]

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 the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration);
  - (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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) 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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 8, 1999.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### **C.16 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 source must comply with the applicable requirements of 40 CFR 68.

#### **C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected 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 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 status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall 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, in accordance with Section D, 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.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]**

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- (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).

**Recordkeeping and Reporting Requirements [326 IAC 2-8-4(3)]**

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

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- (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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all recordkeeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, 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.

**Stratospheric Ozone Protection**

**C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) paint booth, identified as EU-01, constructed in 1999, equipped with one (1) airless spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 01 A and B, capacity: 3,600 pounds of metal beams and parts per hour.
- (b) One (1) paint booth, identified as EU-05, constructed in 1983, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 03, 04 and 05, capacity: 3,600 pounds of metal beams and parts per hour.
- (c) One (1) paint booth, identified as EU-07, constructed in 2002, equipped with one (1) airless HVLP spray gun and a built-in dry filter system, exhausting to Stack S/V 07, capacity: 2,500 pounds of metal parts per hour.

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

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

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5), as delivered to the applicator.

#### D.1.2 Volatile Organic Compounds (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 the three (3) paint booths (EU-01, EU-05 and EU-07) 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 PSD and FESOP Minor Limit [326 IAC 2-2] [326 IAC 2-8-4]

- (a) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the use of VOC, including coatings, dilution solvents, and cleaning solvents, at the three (3) paint booths shall be limited to 95.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, including less than 5.00 tons per year from insignificant activities. Compliance with this limit makes 326 IAC 2-7 (Part 70) not applicable.
- (b) The solids delivered to the applicators at the three (3) paint booths (EU-01, EU-05 and EU-07) shall not exceed 1,226 tons per consecutive twelve (12) month period, total, with compliance determined at the end of each month, based on a ten percent (10%) transfer efficiency and a dry filter control efficiency of ninety-nine percent (99%). This usage limit, in conjunction with Conditions D.2.2 and D.3.2, is required to limit the potential to emit of PM<sub>10</sub> to less than 100 tons per twelve (12) consecutive month period, and to limit the potential to emit PM to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70) not applicable.
- (c) The use of each individual HAP, including HAPs from coatings, dilution solvents, and cleaning solvents, at the three (3) paint booths shall be limited to less than 9.98 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of each individual HAP to less than 10 tons per twelve (12) consecutive month period, including 0.017 tons per year from insignificant activities.

nificant activities. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70) not applicable.

- (d) The use of any combination of HAPs, including HAPs from coatings, dilution solvents, and cleaning solvents, at the three (3) paint booths shall be limited to less than 24.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any combination of HAPs to less than 25 tons per twelve (12) consecutive month period, including 0.573 tons per year from insignificant activities. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70) not applicable.

**D.1.4 Particulate Matter (PM) [40 CFR 52, Subpart P]**

Pursuant to FESOP 043-9832-00049, issued on August 6, 1998 and 40 CFR 52 Subpart P, the PM from the three (3) paint booths (EU-01, EU-5 and EU-07) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

**D.1.5 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.6 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 these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 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, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.8 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the HAPs usage limitations contained in Condition D.1.3 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" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.9 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 paint booth stacks (Stacks S/V 01 A and B, S/V 03, 04 and 05, and S/V 07) while one or more of the booths exhausting to that stack 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 stacks 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.

### **Recordkeeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.10 Recordkeeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.3(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.3(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a 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 cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3(b), 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 solids usage limit established in Condition D.1.3(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The solids content of each coating material and solvent used.
  - (2) The amount of coating material used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The total solids usage for each month; and
  - (4) The weight of solids (PM and PM<sub>10</sub>) emitted for each compliance period.

- (c) To document compliance with Condition D.1.3(c) and (d), 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 HAP usage limits established in Condition D.1.3(c) and (d). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The individual and total HAP content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a 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 individual and total HAP usage for each month; and
  - (4) The weight of each individual HAP and total HAPs emitted for each compliance period.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) To document compliance with Condition D.1.6, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 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 "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)]: Sand Abrasive Booth

- (d) One (1) sand abrasive booth, identified as EU-02, constructed in 1986, equipped with a cartridge dust collector for particulate control and exhausting to Stack S/V 02, capacity: 625 pounds of sand per hour and 16,914 pounds of metal parts per hour.

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) sand abrasive booth (EU-02) shall not exceed 17.6 pounds per hour when operating at a process weight rate of 8.77 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

#### D.2.2 PSD and FESOP Minor Limits [326 IAC 2-2] [326 IAC 2-8-4]

- (a) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM from the sand abrasive booth (EU-02) shall be limited to 1.88 pounds per hour, which is equivalent to less than 8.24 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, will not apply. This will also satisfy the requirements of 326 IAC 6-3-2, in Condition D.2.1.
- (b) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM<sub>10</sub> emissions from the sand abrasive booth (EU-02) shall be limited to 3.42 pounds per hour, equivalent to 15.0 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, will not apply.

#### D.2.3 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.2.4 Particulate Control

In order to comply with Condition D.2.2, the cartridge dust collector for particulate control shall be in operation and control emissions from the sand abrasive booth at all times that the sand abrasive booth is in operation.

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

#### D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the sand abrasive booth (EU-02) stack (S/V 02) exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.

#### D.2.6 Dust Collector Inspections

An inspection shall be performed each calendar quarter of the dust collector controlling the sand abrasive booth. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.

#### D.2.7 Broken or Failed Dust Collector Detection

In the event that dust collector 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 this permit. If operations continue after a 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 units, if failure is indicated by a significant drop in the dust collector's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if 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).

### **Recordkeeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.2.8 Recordkeeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the sand abrasive booth (EU-02) stack (S/V 02) exhaust once per shift.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.

- (c) To document compliance with Condition D.2.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Mechanical Blast Booth

- (e) One (1) mechanical blast unit, identified as EU-03, constructed in 1999, equipped with a dust collector for particulate control and exhausting inside the building, capacity: 107,500 pounds of shot per hour, and 1,500 pounds of metal parts per hour.

(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 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) mechanical blast booth (EU-03) shall not exceed 45.4 pounds per hour when operating at a process weight rate of 54.5 tons per hour.

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

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

#### D.3.2 PSD and FESOP Minor Limits [326 IAC 2-2] [326 IAC 2-8-4]

- (a) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM from the mechanical blast booth (EU-03) shall be limited to 45.25 pounds per hour, which is equivalent to 198 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, will not apply. This will also satisfy the requirements of 326 IAC 6-3-2, in Condition D.3.1.
- (b) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM<sub>10</sub> emissions from the mechanical blast booth (EU-03) shall be limited to 15.29 pounds per hour, equivalent to 67.0 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, will not apply.

#### 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

Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, and in order to comply with Conditions D.3.1 and D.3.2, the dust collector for particulate control shall be in operation and control emissions from the mechanical blast booth at all times that the mechanical blast booth is in operation.

#### D.3.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Conditions D.3.1 and D.3.2, the Permittee shall perform PM and PM<sub>10</sub> testing for the mechanical blast booth (EU-03) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

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

### **D.3.6 Visible Emissions Notations**

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- (a) Visible emission notations of the mechanical blast booth (EU-03) stack exhaust 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.

### **D.3.7 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the mechanical blast booth, at least once per shift when the mechanical blast booth is in operation when venting to the atmosphere. When or any one reading, the pressure drop across the dust collector is outside the normal range of 2.0 and 4.0 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.

### **D.3.8 Dust Collector Inspections**

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

### **D.3.9 Broken or Failed Dust Collector Detection**

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In the event that dust collector 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 this permit. If operations continue after a 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 units, if failure is indicated by a significant drop in the dust collector's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if 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).

### **Recordkeeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.3.10 Recordkeeping Requirements**

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- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the mechanical blast booth (EU-03) stack exhaust once per shift when exhausting to the atmosphere.
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.3.3 the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are re-directed.
- (e) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (a) Six (6) natural gas-fired paint booth radiant heaters, identified as booth heaters, constructed in 1983, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.
- (b) Eight (8) natural gas-fired main shop radiant heaters, identified as shop heaters, four (4) constructed in 1983 and four (4) constructed in 1995, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.
- (c) Twenty-five (25) MIG welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 10.31 pounds of wire per hour, each.
- (d) One (1) TIG welding station, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.33 pounds of wire per hour.
- (e) Three (3) stick welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.08 pounds of wire per hour, each.
- (f) One (1) flame cutting plasma table, constructed in 2001, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 5.0 inches, capacity: six (6) inches per minute.
- (g) Thirteen (13) oxyacetylene flame-cutting stations, constructed in 1986, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 0.5 inches, capacity: 1.2 inches per minute, each.

(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.4.1 Particulate [326 IAC 6-3-2]

- (a) Any change or modification to the welding operations at this source that result in the welding operations consuming six hundred twenty-five (625) pounds of rod or wire per day or more shall cause the welding operations to become subject to 326 IAC 6-3-2, and shall require prior IDEM, OAQ, approval.
- (b) Any change or modification at the oxyacetylene flame-cutting stations at this source that results in cutting three thousand four hundred (3,400) inches per hour of stock or more shall cause the oxyacetylene flame-cutting stations to become subject to 326 IAC 6-3-2, and shall require prior IDEM, OAQ, approval.
- (c) Any change or modification at the flame cutting plasma table at this source that results in cutting three thousand four hundred (3,400) inches per hour of stock or more shall cause the flame cutting plasma table to become subject to 326 IAC 6-3-2, and shall require prior IDEM, OAQ, approval.

### Recordkeeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.4.2 Recordkeeping Requirements

To document compliance with Condition D.4.1(a), the Permittee shall maintain monthly records of the weld wire and rod usage.

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

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

Source Name: Padgett, Inc.  
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150  
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151  
FESOP No.: 043-16746-00049

**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:

Phone:

Date:

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

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

Source Name: Padgett, Inc.  
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150  
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151  
FESOP No.: 043-16746-00049

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- 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<br>Describe:   |
| Type of Pollutants Emitted: TSP, PM <sub>10</sub> , SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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**

**FESOP Quarterly Report**

Source Name: Padgett, Inc.  
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150  
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151  
FESOP No.: 043-16746-00049  
Facilities: Three (3) paint booths (EU-01, EU-05 and EU-07)  
Parameter: VOC usage  
Limit: 95.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

| Month | VOC Usage (tons) | VOC Usage (tons)   | VOC Usage (tons) |
|-------|------------------|--------------------|------------------|
|       | This Month       | Previous 11 Months | 12 Month Total   |
|       |                  |                    |                  |
|       |                  |                    |                  |
|       |                  |                    |                  |

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**

**FESOP Quarterly Report**

Source Name: Padgett, Inc.  
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150  
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151  
FESOP No.: 043-16746-00049  
Facilities: Three (3) paint booths (EU-01, EU-05 and EU-07)  
Parameter: Solids usage  
Limit: 1,226 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, equivalent to 11.0 tons per year of PM and PM<sub>10</sub> emitted

YEAR: \_\_\_\_\_

| Month | Solids Usage (tons) | Solids Usage (tons) | Solids Usage (tons) |
|-------|---------------------|---------------------|---------------------|
|       | This Month          | Previous 11 Months  | 12 Month Total      |
|       |                     |                     |                     |
|       |                     |                     |                     |
|       |                     |                     |                     |

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**

**FESOP Quarterly Report**

Source Name: Padgett, Inc.  
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150  
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151  
FESOP No.: 043-16746-00049  
Facilities: Three (3) paint booths (EU-01, EU-05 and EU-07)  
Parameter: Individual HAP usage  
Limit: Less than 9.98 per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

| Month | Individual HAP Usage (tons) | Individual HAP Usage (tons) | Individual HAP Usage (tons) |
|-------|-----------------------------|-----------------------------|-----------------------------|
|       | This Month                  | Previous 11 Months          | 12 Month Total              |
|       |                             |                             |                             |
|       |                             |                             |                             |
|       |                             |                             |                             |

- 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**

**FESOP Quarterly Report**

Source Name: Padgett, Inc.  
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150  
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151  
FESOP No.: 043-16746-00049  
Facilities: Three (3) paint booths (EU-01, EU-05 and EU-07)  
Parameter: Total HAP usage  
Limit: 24.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

| Month | Total HAP Usage (tons) | Total HAP Usage (tons) | Total HAP Usage (tons) |
|-------|------------------------|------------------------|------------------------|
|       | This Month             | Previous 11 Months     | 12 Month Total         |
|       |                        |                        |                        |
|       |                        |                        |                        |
|       |                        |                        |                        |

- 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**

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

Source Name: Padgett, Inc.  
 Source Address: 901 E. Fourth Street, New Albany, Indiana 47150  
 Mailing Address: P.O. Box 1375, New Albany, Indiana 47151  
 FESOP No.: 043-16746-00049

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

|   |                                      |
|---|--------------------------------------|
| <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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p> |                                      |
| <p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>   |                                      |
| <p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>   |                                      |
| <p><b>Permit Requirement</b> (specify permit condition #)</p>   |                                      |
| <p><b>Date of Deviation:</b></p>  | <p><b>Duration of Deviation:</b></p> |
| <p><b>Number of Deviations:</b></p>   |                                      |
| <p><b>Probable Cause of Deviation:</b></p>  |                                      |
| <p><b>Response Steps Taken:</b></p>   |                                      |
| <p><b>Permit Requirement</b> (specify permit condition #)</p>   |                                      |
| <p><b>Date of Deviation:</b></p>  | <p><b>Duration of Deviation:</b></p> |
| <p><b>Number of Deviations:</b></p>   |                                      |
| <p><b>Probable Cause of Deviation:</b></p>  |                                      |
| <p><b>Response Steps Taken:</b></p>   |                                      |

|  |                               |
|--|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

issued May 20, 2004

## Indiana Department of Environmental Management Office of Air Quality

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

**Source Name:** Padgett, Inc.  
**Source Location:** 901 E. Fourth Street, New Albany, Indiana 47150  
**County:** Floyd  
**SIC Code:** 3441  
**Operation Permit No.:** F 043-16746-00049  
**Permit Reviewer:** CarrieAnn Paukowits

On October 10, 2003, the Office of Air Quality (OAQ) had a notice published in the New Albany Tribune, New Albany, Indiana, stating that Padgett, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate stationary metal products fabrication source with dry filters and dust collectors as controls. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP Renewal should be issued as proposed.

On November 6, 2003, James Padgett of Padgett, Inc. submitted comments on the proposed FESOP. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**):

### Comment 1:

Section D.1.3(b): Why is this calculation based on a transfer efficiency of 10%? That is an unreasonably low figure. If that figure were accurate it would result in a very large volume of waste dry filters. The actual volume of waste filters is quite small.

### Response 1:

Based on EPA's AP-40, the typical transfer efficiency for high volume, low pressure (HVLP) spray guns is ten percent (10%) when applying coatings to beams or parts that are not flat panels. This is a conservative estimate to ensure that the emissions are not greater than those calculated. Since no specific data has been provided to demonstrate that the ten percent (10%) transfer efficiency is not valid for this source, there is no change to the permit.

### Comment 2:

Section D.3.5 requires PM and PM<sub>10</sub> testing (including condensible PM<sub>10</sub>) for the Pangborn exhaust. Padgett does not accept this condition. The Pangborn unit (EU-03) is only operated a few hours per week and the potential to emit could be more effectively controlled by a monthly limitation on the hours of operation. Please note that there is no heat source in this operation, so the requirements to do condensible PM<sub>10</sub> is inappropriate.

### Response 2:

IDEM, OAQ, has determined that stack testing is required for the mechanical blast booth (EU-3) because the emissions from the booth are much higher than the emissions from the other processes at this source (the unrestricted potential PM emissions from the mechanical blast booth are 83.7%

of the total unrestricted potential PM emissions from the source and the unrestricted potential PM<sub>10</sub> emissions from the mechanical blast booth are 82.4% of the total unrestricted potential PM<sub>10</sub> emissions from the source) and a dust collector is required in order for the mechanical blast booth to comply with 326 IAC 2-8-4 (FESOP), as well as 326 IAC 6-3-2, and to make the source a minor source pursuant to 326 IAC 2-2, PSD. The test will demonstrate whether the mechanical blasting booth is in compliance with the emission limitations in Conditions D.3.1 and D.3.2 of the permit. The testing requirements will remain in the permit. However, Since there is no heat source on the mechanical blast booth, the testing for condensible PM<sub>10</sub> is not required, and has been removed as follows:

D.3.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Conditions D.3.1 and D.3.2, the Permittee shall perform PM and PM<sub>10</sub> testing for the mechanical blast booth (EU-03) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. ~~PM<sub>10</sub> includes filterable and condensible PM<sub>10</sub>.~~ Testing shall be conducted in accordance with Section C- Performance Testing.

Upon further review, the OAQ has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

**Change 1:**

Effective March 27, 2004, the emission reporting rule, 326 IAC 2-6, was changed. The rule will no longer be applicable to this source because this source is not a Title V major source, does not emit five (5) tons per year or more of lead and does not emit twenty-five (25) tons per year or more of NO<sub>x</sub> in Lake or Porter County. Therefore, Condition C.19 has been removed from the permit as indicated below, and the remainder of Section C has been renumbered accordingly.

C.19 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

~~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 post-marked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

issued May 20, 2004  
Indiana Department of Environmental Management  
Office of Air Quality

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

**Source Background and Description**

**Source Name:** Padgett, Inc.  
**Source Location:** 901 E. Fourth Street, New Albany, Indiana 47150  
**County:** Floyd  
**SIC Code:** 3441  
**Operation Permit No.:** F 043-16746-00049  
**Permit Reviewer:** CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Padgett, Inc. relating to the operation of a metal products fabrication source. Padgett, Inc. was issued FESOP 043-9832-00049, on August 6, 1998.

This permit contains provisions intended to satisfy the requirements of the construction permit rules.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) paint booth, identified as EU-01, constructed in 1999, equipped with one (1) airless spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 01 A and B, capacity: 3,600 pounds of metal beams and parts per hour.
- (b) One (1) paint booth, identified as EU-05, constructed in 1983, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 03, 04 and 05, capacity: 3,600 pounds of metal beams and parts per hour.
- (c) One (1) paint booth, identified as EU-07, constructed in 2002, equipped with one (1) airless HVLP spray gun and a built-in dry filter system, exhausting to Stack S/V 07, capacity: 2,500 pounds of metal parts per hour.
- (d) One (1) sand abrasive booth, identified as EU-02, constructed in 1986, equipped with a cartridge dust collector for particulate control and exhausting to Stack S/V 02, capacity: 625 pounds of sand per hour and 16,914 pounds of metal parts per hour.
- (e) One (1) mechanical blast unit, identified as EU-03, constructed in 1999, equipped with a dust collector for particulate control and exhausting inside the building, capacity: 107,500 pounds of shot per hour, and 1,500 pounds of metal parts per hour.

**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) Six (6) natural gas-fired paint booth radiant heaters, identified as booth heaters, constructed in 1983, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.
- (b) Eight (8) natural gas-fired main shop radiant heaters, identified as shop heaters, four (4) constructed in 1983 and four (4) constructed in 1995, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.
- (c) Twenty-five (25) MIG welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 10.31 pounds of wire per hour, each.
- (d) One (1) TIG welding station, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.33 pounds of wire per hour.
- (e) Three (3) stick welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.08 pounds of wire per hour, each.
- (f) One (1) flame cutting plasma table, constructed in 2001, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 5.0 inches, capacity: six (6) inches per minute.
- (g) Thirteen (13) oxyacetylene flame-cutting stations, constructed in 1986, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 0.5 inches, capacity: 1.2 inches per minute, each.

### **Existing Approvals**

The source has constructed and has been operating under the following previous approvals including:

- (a) FESOP 043-9832-00049, issued on August 6, 1998; and expires on August 6, 2003,
- (b) First Reopening 043-13042-00049, issued on September 28, 2001, and
- (c) Administrative Amendment 043-15545-00049, issued on February 27, 2002.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

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

- (a) FESOP 043-9832-00049, issued on August 6, 1998

Condition D.1.3(b): The PM<sub>10</sub> emissions from the paint booths shall not exceed 2.74 pounds per hour.

Reason revised: The pound per hour PM<sub>10</sub> limitation for the paint booths was part of the emission limitations that limit the potential to emit PM<sub>10</sub> from the entire source to less than 100 tons per year, and make the requirements of 326 IAC 2-7, Part 70, not applicable. However, the maximum potential to emit PM<sub>10</sub> from insignificant activities was estimated to be less than 5.00 tons per year. The unrestricted potential to emit PM<sub>10</sub> from the total of all insignificant activities is 6.60 tons per year. Therefore, the PM<sub>10</sub> limitation for the paint booths has been adjusted to allow for an addition 2.00 tons per year from insignificant activities. In addition, IDEM, OAQ, currently limits PM and PM<sub>10</sub> emissions from paint booths by limiting the amount of solids delivered to the applicators in every twelve (12) consecutive month period, with compliance determined at the end of each month. The revised limit is described in the "State Rule Applicability - Entire Source" section of this document under "326 IAC 2-8-4 (FESOP)."

- (b) FESOP 043-9832-00049, issued on August 6, 1998

Condition D.1.9: Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

and

Condition D.1.10(b): To document compliance with Condition D.1.3, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

Reason revised: The frequency of visible emissions evaluations has been changed from daily to weekly, and the frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. IDEM, OAQ, has determined this observation frequency is sufficient for this type of operation. The recordkeeping requirements are changed accordingly.

- (c) FESOP 043-9832-00049, issued on August 6, 1998

Condition D.2.4(a): Daily visible emission notations of the sand abrasive booth stack exhaust shall be performed during normal daylight operations when exhausting to the

atmosphere. A trained employee shall record whether emissions are normal or abnormal.

and

Daily visible emission notations of the mechanical blasting booth at the point of exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Reason revised: Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Control device failure can occur suddenly; therefore monitoring of operational parameters should be more frequently than weekly or even daily in such cases where a source operates more than one shift per day. Therefore, the requirements to perform visible emissions notations have been changed from daily to once per shift.

- (d) FESOP 043-9832-00049, issued on August 6, 1998

Condition D.2.1(a): Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sand abrasive booth shall not exceed 1.88 pounds per hour when operating at a process weight rate of 625 pounds per hour.

and

Condition D.3.1(a): Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the mechanical blast unit shall not exceed 45.25 pounds per hour when operating at a process weight rate of 107,500 pounds per hour.

Reason revised: The requirements of 326 IAC 6-3-2, now called Particulate Emission Limitations for Manufacturing Processes, must be calculated using the total process weight rate, including all raw materials (shot, sand, product throughput, etc.). In the initial FESOP, the limitation was calculated based on shot or sand throughput alone. Therefore, the requirements of 326 IAC 6-3-2 are revised in this permit. However, since the stated emission limitations also made this source a minor source pursuant to 326 IAC 2-2, PSD, they will remain in the permit.

- (e) FESOP 043-9832-00049, issued on August 6, 1998

Condition D.2.5: An inspection shall be performed each calendar quarter of the water settling tank. Defective tank part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of tank part(s) replaced. In the event that a water settling tank's failure has been observed: The affected process will be shut down immediately until the failed unit has been replaced. Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Reason revised: The source replaced the water settling tank with a cartridge dust collector. Therefore, the quarterly inspections are still required, but are required of the cartridge dust collector. The dust collector does not have a pressure gauge. Therefore, parametric monitoring is still not required.

The following terms and conditions from previous approvals have been determined to be no longer applicable, and, therefore, are not incorporated into this permit:

- (a) FESOP 043-9832-00049, issued on August 6, 1998

Condition D.4.1: The PM allowable emissions from the welding operations shall not exceed the pound per hour emission rate established as E in the following formula.

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

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

Reason not incorporated: The welding operations at this source consume approximately four hundred (400) pounds of weld wire or rod per week, which is less than six hundred twenty-five (625) pounds of rod or wire per day. Therefore, pursuant to 326 IAC 6-3-2(b)(9), the requirements of 326 IAC 6-3-2, which was revised on June 12, 2002, are not applicable.

- (b) All construction conditions from all previous 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**

IDEM is aware that the source did not apply for a FESOP Renewal in a timely manner. A Notice of Violation was issued on June 6, 2003. This proposed permit is intended to satisfy the requirements of the operation permit rules.

### **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 January 27, 2003. Additional information was received on August 20 and 26, and September 3 and 30, 2003.

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

### **Emission Calculations**

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

### **Unrestricted Potential Emissions**

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

| <b>Pollutant</b> | <b>Unrestricted Potential Emissions (tons/year)</b> |
|------------------|---|
| PM               | 2,251   |
| PM <sub>10</sub> | 1,966   |
| SO <sub>2</sub>  | 0.006   |
| VOC              | 131   |
| CO               | 0.773   |
| NO <sub>x</sub>  | 0.920   |

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

| <b>HAPs</b>     | <b>Unrestricted Potential Emissions (tons/year)</b> |
|-----------------|---|
| Benzene         | 0.00002   |
| Dichlorobenzene | 0.00001   |
| Formaldehyde    | 0.00069   |
| Hexane          | 0.01656   |
| Toluene         | 0.455   |
| Lead            | 0.000005  |
| Cadmium         | 0.00001   |
| Chromium        | 0.00001   |
| Manganese       | 0.566   |
| Nickel          | 0.00002   |
| Xylene          | 53.3  |
| Ethylbenzene    | 12.3  |
| MIBK            | 11.3  |
| <b>TOTAL</b>    | <b>77.9</b>   |

- (a) The unrestricted potential emissions of PM<sub>10</sub> and VOC are equal to or greater than one hundred (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 is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is 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 and Emission Offset applicability.

**Actual Emissions**

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

| Pollutant        | Actual Emissions<br>(tons/year) |
|------------------|---------------------------------|
| PM               | not reported                    |
| PM <sub>10</sub> | 30.0                            |
| SO <sub>2</sub>  | -                               |
| VOC              | 4.00                            |
| CO               | -                               |
| NO <sub>x</sub>  | -                               |
| HAP              | not reported                    |

**Potential to Emit After Issuance**

The source, issued a FESOP on August 6, 1998, 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 the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/emission unit                           | Potential to Emit After Issuance<br>(tons/year) |                  |                 |      |    |                 |  |
|---|---|------------------|-----------------|------|----|-----------------|--|
|   | PM  | PM <sub>10</sub> | SO <sub>2</sub> | VOC  | CO | NO <sub>x</sub> | HAPs                                     |
| Three (3) paint booths (EU-01, EU-05 and EU-07) | 11.0  | 11.0             | -               | 95.0 | -  | -               | less than 9.98 individual and 24.4 total |
| Sand abrasive booth (EU-02)                     | 8.24  | 15.0             | -               | -    | -  | -               |  |
| Mechanical blast booth (EU-03)                  | 198   | 67.0             | -               | -    | -  | -               |  |

| Process/emission unit                              | Potential to Emit After Issuance<br>(tons/year) |                  |                 |       |       |                 |  |
|--|---|------------------|-----------------|-------|-------|-----------------|--|
|  | PM  | PM <sub>10</sub> | SO <sub>2</sub> | VOC   | CO    | NO <sub>x</sub> | HAPs   |
| Insignificant Activities<br>(including combustion) | 6.60  | 6.65             | 0.006           | 0.051 | 0.773 | 0.920           | 0.566 individual metal, 0.017 individual volatile, and 0.583 total |
| Total PTE After Issuance                           | 224   | less than 100    | 0.006           | 0.051 | 0.773 | 0.920           | Single less than 10<br>Total less than 25                          |

The reasons for the limitations are detailed in the “State Rule Applicability - Entire Source” and “State Rule Applicability - Individual Facilities” sections of this document.

### County Attainment Status

The source is located in Floyd County.

| Pollutant        | Status                 |
|------------------|------------------------|
| PM <sub>10</sub> | Attainment             |
| SO <sub>2</sub>  | Attainment             |
| NO <sub>2</sub>  | Attainment             |
| Ozone            | Maintenance 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. Floyd County has been designated as attainment or unclassifiable for ozone.
- (b) Floyd County has been classified as attainment, maintenance attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Federal Rule Applicability

- (a) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The potential to emit each individual HAP is limited to less than ten (10) tons per year, and the potential to emit any combination of HAPs is limited to less than twenty-five (25) tons per year in order to comply with 326 IAC 2-8-4, FESOP (see 326 IAC 2-8-4 (FESOP), below). Therefore, this source is not a major source of HAPs, and the requirements of 40 CFR 63, Subpart M, for Miscellaneous Metal Parts and Products Surface Coating, are

not applicable.

- (c) 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 is not major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs), and the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002, which has not been finalized. The MACT for this source is 40 CFR 63, Subpart M (see (b), above).
- (d) This source is not required to obtain a Part 70 Operating Permit because this source has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable.

#### **State Rule Applicability - Entire Source**

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

Two (2) of the paint booths (EU-01 and EU-07) were constructed after July 27, 1997. The potential to emit each individual HAP is limited to less than ten (10) tons per year, and the potential to emit any combination of HAPs is limited to less than twenty-five (25) tons per year from the entire source, in order to comply with 326 IAC 2-8-4, FESOP (see 326 IAC 2-8-4 (FESOP) in this section). Therefore, this source is not a major source of HAPs, and the requirements of 326 IAC 2-4.1-1 are not applicable to any facilities at this source.

##### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

- (a) The potential to emit PM from this source, which was constructed after August 7, 1977, and is not one (1) of the twenty-eight (28) listed source categories, is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable for PM. Specific limitations are as follows:
  - (1) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM from the sand abrasive booth (EU-02) is limited to 1.88 pounds per hour, which is equivalent to less than 8.24 tons per year. Although this limitation was based on 326 IAC 6-3-2, which is revised in this permit, the limit also made the source a minor source pursuant to 326 IAC 2-2, PSD. Therefore, it will remain in the permit. Since the potential to emit PM after controls is 0.682 pounds per hour, the sand abrasive booth will comply with this limit. The cartridge dust collector must be in operation and control emissions from the sand abrasive booth at all times when the sand abrasive booth is in operation in order to ensure compliance with this limit.
  - (2) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM from the mechanical blast booth (EU-03) is limited to 45.25 pounds per hour, which is equivalent to 198 tons per year. Although this limitation was based on 326 IAC 6-3-2, which is revised in this permit, the limit also made the source a minor source pursuant to 326 IAC 2-2, PSD. Therefore, it will remain in the permit. Since the potential to emit PM after controls is 0.004 pounds per hour, the mechanical blast booth will comply with this limit. The dust collector must be in operation and control emissions from the mechanical blast booth at all times when the mechanical blast booth is in operation in order to ensure compliance with this limit.

- (3) Since PM emissions from the three (3) paint booths (EU-01, EU-05 and EU-07) are equal to PM<sub>10</sub> emissions from those facilities, the solids usage limitation required to comply with 326 IAC 2-8-4, FESOP (see 326 IAC 2-8-4 (FESOP), below) will also limit the potential to emit PM to 11.0 tons per year and make this source a minor source pursuant to 326 IAC 2-2, PSD.

As a result of these limitations, the potential to emit PM from the total of all significant emission units is limited to 217 tons per year. Since the unrestricted potential to emit PM from the total of all insignificant activities is less than 7.00 tons per year, the potential to emit PM<sub>10</sub> from the entire source is limited to less than 224 tons per year, which is less than 250 tons per year.

- (b) The potential to emit PM<sub>10</sub> is limited to less than 100 tons per year to comply with 326 IAC 2-8-4, FESOP (see 326 IAC 2-8-4 (FESOP), below). Compliance with that limit will also ensure that this source is a minor source of PM<sub>10</sub> pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.
- (c) The unrestricted potential to emit VOC, NO<sub>x</sub>, SO<sub>2</sub> and CO is less than 250 tons per year. Therefore, no other limitations are required to make this source a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit of more than ten (10) tons per year of VOC in Floyd County. 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 amount of PM<sub>10</sub> and VOC shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. Specific limitations are as follows:

- (a) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the use of VOC, including coatings, dilution solvents, and cleaning solvents, at the three (3) paint booths shall be limited to 95.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. The unrestricted potential VOC emissions from the total of all insignificant activities is less than 5.00 tons per year. Therefore, this will limit the total source potential to emit VOC to less than 100 tons per year.
- (b) The potential to emit PM<sub>10</sub> is limited to less than 100 tons per year as follows:
  - (1) The solids delivered to the applicators at the three (3) paint booths (EU-01, EU-05 and EU-07) shall not exceed 1,226 tons per consecutive twelve (12) month period, total, with compliance determined at the end of each month, based on a ten percent (10%) transfer efficiency and a dry filter control efficiency of ninety-nine percent (99%). This is equivalent to PM<sub>10</sub> emissions of 11.0 tons per year from the total of the three (3) paint booths, when operating the dry filters at all times when the three (3) paint booths are in operation.

- (2) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM<sub>10</sub> emissions from the sand abrasive booth (EU-02) is limited to 3.42 pounds per hour, equivalent to 15.0 tons per year. Since the potential to emit PM<sub>10</sub> after controls is 0.478 pounds per hour, the sand abrasive booth will comply with this limit. The cartridge dust collector must be in operation and control emissions from the sand abrasive booth at all times when the sand abrasive booth is in operation in order to ensure compliance with this limit.
- (3) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM<sub>10</sub> emissions from the mechanical blasting booth (EU-03) is limited to 15.29 pounds per hour, equivalent to 67.0 tons per year. Since the potential to emit PM<sub>10</sub> after controls is 0.004 pounds per hour, the mechanical blast booth will comply with this limit. The dust collector must be in operation and control emissions from the mechanical blast booth at all times when the mechanical blast booth is in operation in order to ensure compliance with this limit.

As a result of these limitations, the potential to emit PM<sub>10</sub> from the total of all significant emission units is limited to 93.0 tons per year. Since the unrestricted potential to emit PM<sub>10</sub> from the total of all insignificant activities is less than 7.00 tons per year, the potential to emit PM<sub>10</sub> from the entire source is limited to less than 100 tons per year.

- (c) The use of each individual HAP, including HAPs from coatings, dilution solvents, and cleaning solvents, at the three (3) paint booths shall be limited to less than 9.98 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the use of any combination of HAPs, including HAPs from coatings, dilution solvents, and cleaning solvents, at the three (3) paint booths shall be limited to less than 24.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. The unrestricted potential individual organic HAP emissions from the total of all insignificant activities is 0.017 tons per year, and the total HAP emissions from the total of all insignificant activities is 0.573 tons per year. Therefore, this will limit the total source potential to emit each individual HAP to less than 10 tons per year, and the potential to emit total HAPs to less than 25 tons per year.

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

#### State Rule Applicability - Individual Facilities

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

The one (1) paint booth, identified as EU-05, constructed in 1983, which is after November 1, 1980, has potential emissions of twenty-five (25) tons per year or more of VOC. The two (2) paint booths,

identified as EU-01 and EU-07, constructed after July 1, 1990 (constructed in 1999 and 2002, respectively), have actual VOC emissions of fifteen (15) pounds per day or more, each. Therefore, the three (3) paint booths are subject to the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the three (3) paint booths (EU-1, EU-5 and EU-7) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for 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 MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The welding operations at this source consume approximately four hundred (400) pounds of weld wire or rod per week, which is less than six hundred twenty-five (625) pounds of rod or wire per day. Therefore, pursuant to 326 IAC 6-3-2(b)(9), the requirements of 326 IAC 6-3-2 are not applicable. Since the welding operations have the potential to consume more than six hundred twenty-five (625) pounds of rod or wire per day, records will be required to monitoring actual weld wire and rod usage.
- (b) The oxyacetylene flame-cutting stations at this source cut less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less, total. Therefore, pursuant to 326 IAC 6-3-2(b)(10), the requirements of 326 IAC 6-3-2 are not applicable.
- (c) The flame cutting plasma table at this source cuts less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less. Therefore, pursuant to 326 IAC 6-3-2(b)(10), the requirements of 326 IAC 6-3-2 are not applicable.
- (d) The particulate from the one (1) sand abrasive booth (EU-02) shall not exceed 17.6 pounds per hour when operating at a process weight rate of 8.77 tons per hour, including the weight of the parts and sand. The potential to emit PM from the sand abrasive booth is 17.1 pounds per hour before control and 0.682 pounds per hour after control by the cartridge dust collector. Therefore, the one (1) sand abrasive booth (EU-02) will comply with this rule. This limitation is based upon the following:

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

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

- (e) The particulate from the one (1) mechanical blast booth (EU-03) shall not exceed 45.4 pounds per hour when operating at a process weight rate of 54.5 tons per hour, including the weight of the parts and shot. The potential to emit PM from the mechanical blast booth is 0.004 pounds per hour after control by the dust collector. Therefore, the dust collector must be in operation and control emissions from the mechanical blast booth at all times the one (1) mechanical blast booth (EU-03) is in operation in order to comply with this rule. This limitation is based upon the following:

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

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

### 326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to FESOP 043-9832-00049, issued on August 6, 1998 and 40 CFR 52 Subpart P the particulate matter (PM) from the paint booths shall be limited by the following:

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

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

Under the rule revision, particulate from the surface coating shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

### 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source does not have the potential to emit 40 tons of NO<sub>x</sub> per year or more in Floyd County. Therefore, the requirements of 326 IAC 10-1 are not applicable.

### Testing Requirements

The following new testing requirements were incorporated into this FESOP, because the potential particulate emissions from the mechanical blast booth are much higher than the emissions from the other processes at this source (the unrestricted potential emissions from the mechanical blast booth are more than forty percent (40%) of the total unrestricted potential emissions from the source) and a dust collector is required in order for the mechanical blast booth to comply with 326 IAC 2-8-4 (FESOP), as well as 326 IAC 6-3-2 and to make the source a minor source pursuant to 326 IAC 2-2, PSD:

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with the PM and PM<sub>10</sub> limitations in the permit, the Permittee shall perform PM and PM<sub>10</sub> testing for the mechanical blast booth utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

## Compliance Requirements

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

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

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

- (a) The three (3) paint booths have applicable compliance monitoring conditions as specified below:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (Stacks S/V 01 A and B, S/V 03, 04 and 05, and S/V 07) while one or more of the booths exhausting to that stack 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.
  - (2) Monthly inspections shall be performed of the coating emissions from the stacks 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.
  - (3) 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 operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP) and ensure that this source is a minor source pursuant to 326 IAC 2-2 (PSD).

- (b) The one (1) sand abrasive booth has applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the sand abrasive booth (EU-02) stack (S/V 02) exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for 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.
  - (2) An inspection shall be performed each calendar quarter of the cartridge dust collector controlling the sand abrasive booth. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.
  - (3) In the event that dust collector 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 this permit. If operations continue after a 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 units, if failure is indicated by a significant drop in the dust collector's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if 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 cartridge dust collector for the sand abrasive booth must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP) and ensure that this source is a minor source pursuant to 326 IAC 2-2 (PSD).

- (c) The one (1) mechanical blast booth has applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the mechanical blast booth (EU-03) stack exhaust 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. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for 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.
  - (2) An inspection shall be performed each calendar quarter of the dust collector controlling the mechanical blast booth when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.
  - (3) In the event that dust collector 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 this permit. If operations continue after a 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 units, if failure is indicated by a significant drop in the dust collector's pressure readings with abnormal visible emissions or

the failure is indicated by an opacity violation, or if 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).

- (4) The following new compliance requirements were incorporated into this FESOP:

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the mechanical blast booth, at least once per shift when the mechanical blast booth is in operation when venting to the atmosphere. When or any one reading, the pressure drop across the dust collector is outside the normal range of 2.0 and 4.0 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.

These monitoring conditions are necessary because the dust collector for the mechanical blast booth must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP) and ensure that this source is a minor source pursuant to 326 IAC 2-2 (PSD).

## **Conclusion**

The operation of this metal products fabrication source shall be subject to the conditions of the attached proposed FESOP Renewal No.: F 043-16746-00049.

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

Company Name: **Padgett, Inc.**  
Address City IN Zip: **901 E. Fourth Street, New Albany, Indiana 47150**  
FESOP: **043-16746**  
Plt ID: **043-00049**  
Reviewer: **CarrieAnn Paukowits**  
Date: **January 27, 2003**

| Material                         | Density (lb/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics                             | Volume % Water | Volume % Non-Vol (solids) | Gal of Material (gal/unit) | Maximum (units/hour) | Flash-off (fraction) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC (lbs/hr) | Potential VOC (lbs/day) | Potential VOC (tons/yr) | Particulate Potential (tons/yr) | VOC solids (lbs/gal) | Transfer Efficiency | Material Substrate |
|----------------------------------|------------------|------------------------------------|----------------|---|----------------|---------------------------|----------------------------|----------------------|----------------------|---|----------------------------------|------------------------|-------------------------|-------------------------|---------------------------------|----------------------|---------------------|--------------------|
| <b>EU-01 and EU-05</b>           |                  |                                    |                |   |                |                           |                            |                      |                      |   |                                  |                        |                         |                         |                                 |                      |                     |                    |
| Amerlock 2 Cure                  | 11.76            | 12.80%                             | 0.0%           | 12.80%  | 0.0%           | 74.7%                     | 0.40                       | 7.00                 | 1.0                  | 1.51  | 1.51                             | 4.22                   | 101                     | 18.5                    | 113.2                           | 2.02                 | 10%                 | Metal              |
| Amerlock 2 Custom Color Resin    | 12.30            | 11.00%                             | 0.0%           | 11.00%  | 0.0%           | 91.4%                     | 0.40                       | 7.00                 | 1.0                  | 1.35  | 1.35                             | 3.79                   | 90.9                    | 16.6                    | 120.8                           | 1.48                 | 10%                 | Metal              |
| 6ST 00032                        | 7.25             | 100.00%                            | 0.0%           | 100.00%                                       | 0.0%           | 0.0%                      | 0.20                       | 7.00                 | 1.0                  | 7.25  | 7.25                             | 10.15                  | 244                     | 44.5                    | 0.0                             | n/a                  | 10%                 | Metal              |
| R-T-S                            | 11.07            | 23.42%                             | 0.00%          | 23.42%  | 0.0%           | 66.4%                     | 1.00                       | 7.00                 | 1.0                  | 2.59  | 2.59                             | 18.2                   | 436                     | 79.5                    | 234.0                           | 3.90                 | 10%                 | Metal              |
| 9510 Fab Prime                   | 10.75            | 32.00%                             | 0.00%          | 32.00%  | 0.0%           | 47.5%                     | 1.00                       | 7.00                 | 1.0                  | 3.44  | 3.44                             | 24.1                   | 578                     | 105.5                   | 201.7                           | 7.24                 | 10%                 | Metal              |
| EU-07                            |                  |                                    |                |   |                |                           |                            |                      |                      |   |                                  |                        |                         |                         |                                 |                      |                     |                    |
| Warm Gray 3C                     | 11.3             | 30.60%                             | 0.0%           | 30.60%  | 0.0%           | 69.10%                    | 0.17000                    | 10.000               | 1.0                  | 3.47  | 3.47                             | 5.9                    | 141                     | 25.8                    | 52.7                            | 5.02                 | 10%                 | Metal              |
| <b>State Potential Emissions</b> |                  |                                    |                | <b>Add worst case coating to all solvents</b> |                |                           |                            |                      |                      |   |                                  |                        |                         |                         |                                 |                      |                     |                    |
|                                  |                  |                                    |                |   |                |                           |                            |                      |                      |   | <b>TOTALS:</b>                   | <b>30.0</b>            | <b>719</b>              | <b>131</b>              | <b>287</b>                      |                      |                     |                    |
|                                  |                  |                                    |                |   |                |                           |                            |                      |                      |   | <b>Control Efficiency:</b>       | <b>0.0%</b>            | <b>0.0%</b>             | <b>0.0%</b>             | <b>99.0%</b>                    |                      |                     |                    |
|                                  |                  |                                    |                |   |                |                           |                            |                      |                      |   | <b>Potential after Control:</b>  | <b>30.0</b>            | <b>719</b>              | <b>131</b>              | <b>2.87</b>                     |                      |                     |                    |

METHODOLOGY

RTS Density (lbs/gal) = ((Da\*Va)+(Db\*Vb)+(Dc\*Vc))/(Va+Vb+Vc)

RTS Weight % H2O + Organics = ((Wa\*Da\*Va)+(Wb\*Db\*Vb)+(Wc\*Dc\*Vc))/((Da\*Va)+(Db\*Vb)+(Dc\*Vc))

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) \* Flash-off

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day) \* Flash-off

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) \* Flash-off

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) \* Flash-off

Total = RTS

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

**Company Name:** Padgett, Inc.  
**Address City IN Zip:** 901 E. Fourth Street, New Albany, Indiana 47150  
**FESOP:** 043-16746  
**Plt ID:** 043-00049  
**Permit Reviewer:** CarrieAnn Paukowits  
**Date:** January 27, 2003

| Material                      | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Ethylbenzene | Weight % Toluene | Weight % MIBK | Xylene Emissions (ton/yr) | Ethylbenzene Emissions (ton/yr) | Toluene Emissions (ton/yr) | MIBK Emissions (ton/yr) | Total HAP Emissions (ton/yr) |
|-------------------------------|------------------|--------------------------------|---------------------|-----------------|-----------------------|------------------|---------------|---------------------------|---------------------------------|----------------------------|-------------------------|------------------------------|
| <b>EU-01 and EU-05</b>        |                  |                                |                     |                 |                       |                  |               |                           |                                 |                            |                         |                              |
| <b>Ameron Epoxy</b>           |                  |                                |                     |                 |                       |                  |               |                           |                                 |                            |                         |                              |
| Amerlock 2 Cure               | 11.76            | 0.40                           | 7.00                | 11.50%          | 2.70%                 | 0.00%            | 0.00%         | 16.59                     | 3.89                            | 0.00                       | 0.00                    | 20.48                        |
| Amerlock 2 Custom Color Resin | 12.30            | 0.40                           | 7.00                | 0.00%           | 0.00%                 | 0.00%            | 0.00%         | 0.00                      | 0.00                            | 0.00                       | 0.00                    | 0.00                         |
| 65T 00032                     | 7.25             | 0.20                           | 7.00                | 80.00%          | 19.00%                | 1.00%            | 0.00%         | 35.57                     | 8.45                            | 0.44                       | 0.00                    | 44.46                        |
| <b>Primer</b>                 |                  |                                |                     |                 |                       |                  |               |                           |                                 |                            |                         |                              |
| 9510 Fab Prime                | 10.75            | 1.00                           | 7.00                | 10.00%          | 0.00%                 | 0.00%            | 0.00%         | 32.96                     | 0.00                            | 0.00                       | 0.00                    | 32.96                        |
| <b>EU-07</b>                  |                  |                                |                     |                 |                       |                  |               |                           |                                 |                            |                         |                              |
| Warm Gray 3C                  | 11.3             | 0.17                           | 10.00               | 1.31%           | 0.00%                 | 0.00%            | 13.35%        | 1.10                      | 0.00                            | 0.00                       | 11.26                   | 12.36                        |

Total State Potential Emissions

**Totals:            53.3            12.3            0.445            11.3            77.3**

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
Abrasive Blasting - Confined  
One (1) sand abrasive blaster (EU-02)**

Company Name: Padgett, Inc.  
Address City IN Zip: 901 E. Fourth Street, New Albany, Indiana 47150  
FESOP: 043-16746  
Plt ID: 043-00049  
Reviewer: CarrieAnn Paukowits  
Date: January 27, 2003

**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 =

|       |
|-------|
| 625   |
| 99    |
| 99    |
| 0.375 |
| 0.325 |

**Flow Rate (FR) (lb/hr) = 832.101 per nozzle**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM / lb abrasive) From Table 1 =  
EF = emission factor (lb PM10 / lb PM) From Table 1 =  
FR = Flow Rate (lb/hr) =  
w = fraction of time of wet blasting =  
N = number of nozzles =

|         |
|---------|
| 0.041   |
| 0.700   |
| 832.101 |
| 100 %   |
| 1       |

|                                 | PM    | PM-10 |        |
|---------------------------------|-------|-------|--------|
| <b>Uncontrolled Emissions =</b> | 17.1  | 11.9  | lb/hr  |
|                                 | 74.7  | 52.3  | ton/yr |
| <b>Control Efficiency =</b>     | 96.0% |       |        |
| <b>Controlled Emissions =</b>   | 0.682 | 0.478 | lb/hr  |
|                                 | 2.99  | 2.09  | 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)<sup>2</sup> 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 - Confined  
One (1) mechanical blast booth (EU-03)**

**Company Name:** Padgett, Inc.  
**Address City IN Zip:** 901 E. Fourth Street, New Albany, Indiana 47150  
**FESOP:** 043-16746  
**Plt ID:** 043-00049  
**Reviewer:** CarrieAnn Paukowits  
**Date:** January 27, 2003

**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              |

**Flow Rate (FR) (lb/hr) = 107500 per nozzle**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 EF = emission factor (lb PM10/ lb PM) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

|            |
|------------|
| 0.004      |
| 0.860      |
| 107500.000 |
| 0 %        |
| 1          |

|                                 | PM             | PM-10        |               |
|---------------------------------|----------------|--------------|---------------|
| <b>Uncontrolled Emissions =</b> | <b>430</b>     | <b>370</b>   | <b>lb/hr</b>  |
|                                 | <b>1883</b>    | <b>1620</b>  | <b>ton/yr</b> |
| <b>Control Efficiency =</b>     | <b>99.999%</b> |              |               |
| <b>Uncontrolled Emissions =</b> | <b>0.004</b>   | <b>0.004</b> | <b>lb/hr</b>  |
|                                 | <b>0.019</b>   | <b>0.016</b> | <b>ton/yr</b> |

**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)<sup>2</sup> 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  
Welding and Thermal Cutting**

**Company Name:** Padgett, Inc.  
**Address City IN Zip:** 901 E. Fourth Street, New Albany, Indiana 47150  
**FESOP:** 043-16746  
**Pit ID:** 043-00049  
**Reviewer:** CarrieAnn Paukowits  
**Date:** January 27, 2003

| PROCESS                                | Number of Stations | Max. electrode consumption per station (lbs/hr) |                                      | EMISSION FACTORS*<br>(lb pollutant/lb electrode)                |        |        |        | EMISSIONS<br>(lbs/hr) |          |          |          | HAPS<br>(lbs/hr) |
|--|--------------------|---|--------------------------------------|---|--------|--------|--------|-----------------------|----------|----------|----------|------------------|
|  |                    |   |                                      | PM = PM10   | Mn     | Ni     | Cr     | PM = PM10             | Mn       | Ni       | Cr       |                  |
| WELDING                                |                    |   |                                      |   |        |        |        |                       |          |          |          |                  |
| Submerged Arc                          | 0                  | 0   |                                      | 0.036   | 0.011  |        |        | 0.000                 | 0.000    | 0.000    | 0        | 0.000            |
| Metal Inert Gas (MIG)(carbon steel)    | 25                 | 10.31   |                                      | 0.0055  | 0.0005 |        |        | 1.418                 | 0.129    | 0.000    | 0        | 0.129            |
| Stick (E7018 electrode)                | 3                  | 0.08  |                                      | 0.0211  | 0.0009 |        |        | 0.005                 | 0.0002   | 0.000    | 0        | 0.0002           |
| Tungsten Inert Gas (TIG)(carbon steel) | 1                  | 0.33  |                                      | 0.0055  | 0.0005 |        |        | 0.002                 | 0.0002   | 0.000    | 0        | 0.0002           |
| Oxyacetylene(carbon steel)             | 0                  |   |                                      | 0.0055  | 0.0005 |        |        | 0.000                 | 0.000    | 0.000    | 0        | 0.000            |
|  |                    |   |                                      |   |        |        |        |                       |          |          |          |                  |
|  |                    |   |                                      |   |        |        |        |                       |          |          |          |                  |
| FLAME CUTTING                          | Number of Stations | Max. Metal Thickness Cut (in.)                  | Max. Metal Cutting Rate (in./minute) | EMISSION FACTORS<br>(lb pollutant/1,000 inches cut, 1" thick)** |        |        |        | EMISSIONS<br>(lbs/hr) |          |          |          | HAPS<br>(lbs/hr) |
|  |                    |   |                                      | PM = PM10   | Mn     | Ni     | Cr     | PM = PM10             | Mn       | Ni       | Cr       |                  |
| Oxyacetylene                           | 13                 | 0.5   | 1.2                                  | 0.1622  | 0.0005 | 0.0001 | 0.0003 | 0.076                 | 2.92E-06 | 5.84E-10 | 1.46E-13 | 2.92E-06         |
| Oxymethane                             | 0                  |   |                                      | 0.0815  | 0.0002 |        | 0.0002 | 0.000                 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00         |
| Plasma**                               | 1                  | 0.31  | 6                                    | 0.0039  |        |        |        | 0.001                 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00         |
|  |                    |   |                                      |   |        |        |        |                       |          |          |          |                  |
|  |                    |   |                                      |   |        |        |        |                       |          |          |          |                  |
| <b>EMISSION TOTALS</b>                 |                    |   |                                      |   |        |        |        |                       |          |          |          |                  |
| Potential Emissions lbs/hr             |                    |   |                                      |   |        |        |        | 1.50                  | 0.129    | 0.00     | 0.00     | 0.129            |
| Potential Emissions lbs/day            |                    |   |                                      |   |        |        |        | 36.0                  | 3.10     | 0.00     | 0.00     | 3.10             |
| Potential Emissions tons/year          |                    |   |                                      |   |        |        |        | 6.58                  | 0.566    | 0.00     | 0.00     | 0.566            |

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

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

**Company Name:** Padgett, Inc.  
**Address City IN Zip:** 901 E. Fourth Street, New Albany, Indiana 47150  
**FESOP:** 043-16746  
**Pit ID:** 043-00049  
**Reviewer:** CarrieAnn Paukowits  
**Date:** January 27, 2003

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2.1

18.4

| Emission Factor in lb/MMCF    | Pollutant |       |       |             |       |       |
|-------------------------------|-----------|-------|-------|-------------|-------|-------|
|                               | PM*       | PM10* | SO2   | NOx         | VOC   | CO    |
|                               | 1.9       | 7.6   | 0.6   | 100.0       | 5.5   | 84.0  |
|                               |           |       |       | **see below |       |       |
| Potential Emission in tons/yr | 0.017     | 0.070 | 0.006 | 0.920       | 0.051 | 0.773 |

\*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

See page 7 for HAPs emissions calculations.

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

**Company Name:** Padgett, Inc.  
**Address City IN Zip:** 901 E. Fourth Street, New Albany, Indiana 47150  
**Permit Number:** 043-16746  
**Pit ID:** 043-00049  
**Reviewer:** CarrieAnn Paukowits  
**Date:** January 27, 2003

| HAPs - Organics               |                    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 1.932E-05          | 1.104E-05                  | 6.899E-04               | 1.656E-02         | 3.127E-05          |

| HAPs - Metals                 |                 |                    |                     |                      |                   |              |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|--------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 | <b>Total</b> |
| Potential Emission in tons/yr | 4.599E-06       | 1.012E-05          | 1.288E-05           | 3.495E-06            | 1.932E-05         | <b>0.017</b> |

Methodology is the same as page 6.

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