



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 8, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Rittal Electromate / 151-17851-00042

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



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

**Rittal Electromate
301 West Water Street
Fremont, Indiana 46737**

(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.

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Issued by:Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:October 8, 2004 Expiration Date:October 8, 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)]

The Permittee owns and operates a stationary electrical enclosures fabrication, assembly, and surface coating plant.

Authorized individual:	Ross Riches
Source Address:	301 West Water Street, Fremont, Indiana 46737
Mailing Address:	301 West Water Street, Fremont, Indiana 46737
General Source Phone:	(260) 495-9815
SIC Code:	3644
Source Location Status:	Steuben
	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)]

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

- (a) One (1) manual powder coating spray booth, identified as P-1, using an air atomized application system, processing at a maximum of 42 metal enclosures per hour and spraying at a maximum capacity of 24 pounds of powder per hour, with a baghouse, identified as BH4, for particulate control, and exhausting at one (1) stack (S/V ID: NV17);
- (b) One (1) manual powder coating spray self-contained booth, identified as P-2, using four (4) air atomization spray guns, spraying at a maximum capacity of 24 pounds of powder per hour and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (c) One (1) high-volume electrostatic powder surface coating self-contained booth, identified as P-B, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (d) One (1) high-volume electrostatic powder surface coating self-contained booth, identified as P-C, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (e) One (1) low-volume electrostatic powder surface coating booth, identified as P-3, equipped with two (2) manual powder spray guns, with a maximum capacity of spraying 14.2 pounds of powder per hour, utilizing a baghouse (BH3) for particulate control and exhausting through one (1) stack (S/V ID: NV3); and
- (f) One (1) surface powder coating self-contained booth, identified as P-4, consisting of two

(2) high volume-low pressure (HVLP) spray guns with maximum capacity of 14.2 pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (7) one (1) air makeup unit rated at 5.39 MMBtu/hr;
 - (2) one (1) pretreatment process water heater rated at 0.938 MMBtu/hr;
 - (3) one (1) pretreatment process water heater rated at 0.789 MMBtu/hr;
 - (4) one (1) pretreatment dry-off oven rated at 0.4 MMBtu/hr;
 - (5) four (4) area heaters each rated at 0.4 MMBtu/hr;
 - (6) one (1) carrier burn-off oven rated at 0.30 MMBtu/hr;
 - (7) sixteen (16) infrared hanging heaters with a total rating of 0.96 MMBtu/hr;
 - (8) two (2) cure ovens each rated at 1.65 MMBtu/hr;
 - (9) one (1) dry off oven rated at 1.65 MMBtu/hr;
 - (10) one (1) HV cure oven rated at 3.10 MMBtu/hr;
 - (11) one (1) cure oven rated at 3.00 MMBtu/hr; and
 - (12) one (1) HVAC unit rated at 0.45 MMBtu/hr.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) spot welding of metal enclosures
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:
 - (1) one (1) fully enclosed sand blasting cabinet, identified as SB1, utilizing a baghouse (BH7) for particulate control;
 - (2) fifteen (15) hand grinders;
 - (3) fifteen (15) hand polishers;
 - (4) one (1) wheel grinder;
 - (5) three (3) fully enclosed sand blasting cabinet, identified as SB2 fully self contained;
 - (6) seventeen (17) six-inch belt sanders utilizing a baghouse (BH5) for particulate control;
 - (7) one (1) inert gas laser cutter utilizing a baghouse for particulate control; and
 - (8) two (2) wheel grinders.
- (h) The following emission units with VOC emissions below 5 pounds per hour or 15 pounds

per day:

- (1) one (1) three stage washer system utilizing non-VOC detergents; and
 - (2) one (1) pretreatment wash booth utilizing non-VOC detergents
- (i) Other categories with PM emissions below 5 pounds per hour or 25 pounds per day:
- (1) seven (7) Metal Inert Gas (MIG) welding stations emitting less than 1 ton per year of a single HAP;
 - (2) six (6) Tungsten Inert Gas (TIG) welding stations emitting less than 1 ton per year of a single HAP;
 - (3) ten (10) MIG welding stations with PM emission less than 25 pounds per day;
 - (4) eight (8) TIG welding stations with PM emissions less than 25 pounds per day.
- (j) The following emission units emitting greater than 1 pounds per day but less than 5 pounds per day or 1 ton per year of a single HAP:
- (1) one (1) gasket applicator robot identified as G-1; and
 - (2) one (1) gasket applicator robot identified as G-2.

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) deleted
- by 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 July 1 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.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

- (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)]

- (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][IC13-30-3-1][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

Entire Source

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

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

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) 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 record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

C.13 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.
- (c) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to F 151-9421-00042.

C.14 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.15 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.16 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 January 22, 1998.
- (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.17 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.18 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 ten (10) days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.
- C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]
-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 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.

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) manual powder coating spray booth, identified as P-1, using an air atomized application system, processing at a maximum of 42 metal enclosures per hour and spraying at a maximum capacity of 24 pounds of powder per hour, with a baghouse, identified as BH4, for particulate control, and exhausting at one (1) stack (S/V ID: NV17);
- (b) One (1) manual powder coating spray self-contained booth, identified as P-2, using four (4) air atomization spray guns, spraying at a maximum capacity of 24 pounds of powder per hour and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (c) One (1) high-volume electrostatic powder surface coating self-contained booth, identified as P-B, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (d) One (1) high-volume electrostatic powder surface coating self-contained booth, identified as P-C, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (e) One (1) low-volume electrostatic powder surface coating booth, identified as P-3, equipped with two (2) manual powder spray guns, with a maximum capacity of spraying 14.2 pounds of powder per hour, utilizing a baghouse (BH3) for particulate control and exhausting through one (1) stack (S/V ID: NV3); and
- (f) One (1) surface powder coating self-contained booth, identified as P-4, consisting of two (2) high volume-low pressure (HVLP) spray guns with maximum capacity of 14.2 pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building.

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

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

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM emission from each powder coating operation P-B and P-C shall each not exceed 0.62 pounds per hour when operating at a process weight flow rate of 120 pounds of powder per hour. This particulate limitation was calculated using the following equation:

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:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate (PM) emission rate from each powder coating operation, P-1, P-2, P-3 and P-4, shall not exceed 0.551 pounds per hour when operating at a process weight flow rate of less than 100 pounds of powder per hour
- (c) Pursuant to 326 IAC 6-3-2(d), the source shall operate the baghouses for particulate emission control at powder booths (P-1 and P-3) and the powder recovery systems with their vacuum filter array for particulate emission control at powder booths (P-2 and P-4) in accordance with manufacturer's specifications.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the powder coating booths (P-B, P-C, P-1, P-2, P-3 and P-4) and their baghouses and powder recovery equipment.

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

D.1.3 Particulate Control

In order to comply with condition D.1.1, the baghouses (BH3 and BH4) and the powder recovery equipment for particulate control shall be in operation and control emissions from the six (6) powder coating booths (P-B, P-C, P-1, P-2, P-3, P-4) at all times that the six (6) powder coating booths (P-B, P-C, P-1, P-2, P-3 and P-4) are in operation.

D.1.4 Visible Emissions Notations

- (a) Once per shift visible emission notations of the six (6) powder coating booths (P-B, P-C, P-1, P-2, P-3 and P-4) stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

D.1.5 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 vacuum filters, weekly observations shall be made of the overspray from the powder coating booths (P-2, P-4, P-B and P-C) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (BH3 and BH4) used in conjunction with the powder coating processes at booths (P-1 and P-3), at least once per shift when the powder coating processes at booths (P-1 and P-3) in operation when venting to the atmosphere. When for any one reading, the pressure drop across the each baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

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

D.1.7 Baghouse Inspections

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

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the stack exhaust once per shift.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
 - (1) Once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.
- (d) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

The following are insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) air makeup unit rated at 5.39 MMBtu/hr;
 - (2) one (1) pretreatment process water heater rated at 0.938 MMBtu/hr;
 - (3) one (1) pretreatment process water heater rated at 0.789 MMBtu/hr;
 - (4) one (1) pretreatment dry-off oven rated at 0.4 MMBtu/hr;
 - (5) four (4) area heaters each rated at 0.4 MMBtu/hr;
 - (6) one (1) carrier burn-off oven rated at 0.30 MMBtu/hr;
 - (7) sixteen (16) infrared hanging heaters with a total rating of 0.96 MMBtu/hr;
 - (8) two (2) cure ovens each rated at 1.65 MMBtu/hr;
 - (9) one (1) dry off oven rated at 1.65 MMBtu/hr;
 - (10) one (1) HV cure oven rated at 3.10 MMBtu/hr;
 - (11) one (1) cure oven rated at 3.00 MMBtu/hr; and
 - (12) one (1) HVAC unit rated at 0.45 MMBtu/hr.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
 - (1) one (1) waste-oil fired heater rated at 0.225 MMBtu/hr.
- (c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) spot welding of metal enclosures
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:
 - (1) one (1) fully enclosed sand blasting cabinet, identified as SB1, utilizing a baghouse (BH7) for particulate control exhausting through one stack;
 - (2) fifteen (15) hand grinders;
 - (3) fifteen (15) hand polishers;
 - (4) one (1) wheel grinder;
 - (5) three (3) fully enclosed sand blasting cabinet, identified as SB2 fully self contained;
 - (6) seventeen (17) six-inch belt sanders utilizing a baghouse (BH5) for particulate control;
 - (7) one (1) inert gas laser cutter utilizing a baghouse for particulate control; and
 - (8) two (2) wheel grinders.

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

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

- (g) The following emission units with VOC emissions below 5 pounds per hour or 15 pounds per day:
 - (1) one (1) three stage washer system utilizing non-VOC detergents; and
 - (2) one (1) pretreatment wash booth utilizing non-VOC detergents
- (i) Other categories with PM emissions below 5 pounds per hour or 25 pounds per day:
 - (1) seven (7) Metal Inert Gas (MIG) welding stations emitting less than 1 ton per year of a single HAP;
 - (2) six (6) Tungsten Inert Gas (TIG) welding stations emitting less than 1 ton per year of a single HAP;
 - (3) ten (10) MIG welding stations with PM emission less than 25 pounds per day;
 - (4) eight (8) TIG welding stations with PM emissions less than 25 pounds per day.
- (j) The following emission units emitting greater than 1 pounds per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - (1) one (1) gasket applicator robot identified as G-1; and
 - (2) one (1) gasket applicator robot identified as G-2.

(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]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblaster (SB1 and SB2) shall not exceed 1.28 pounds per hour when operating at a process weight rate of 354 pounds abrasive 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:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate (PM) emission rate from the seventeen (17) belt sanders shall be limited according to the following equation:

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:

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

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the portable grinder controlled by one (1) baghouse, identified as BH6 shall not exceed 1.02 pounds per hour when operating at a process weight rate of 250 pounds of raw materials 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the baghouses (BH5 and BH7). A Preventive Maintenance Plan is not required for the portable dual grinder controlled by baghouse, identified as BH6.

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

D.2.3 Particulate Control

In order to comply with condition D.2.1, the baghouses (BH5, BH6 and BH7) for particulate control shall be in operation and control emissions from the shotblasters (SB1 and SB2), machining, welding and grinding units at all times that the shotblasters (SB1 and SB2), machining, welding and grinding units are in operation.

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

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

Source Name: Rittal Electromate
Source Address: 3065 East Water Street, Fremont, Indiana 46737
Mailing Address: 301 West Water Street, Fremont, Indiana 46737
FESOP No.: F 151-17851-00042

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Rittal Electromate
Source Address: 3065 East Water Street, Fremont, Indiana 46737
Mailing Address: 301 West Water Street, Fremont, Indiana 46737
FESOP No.: F151-17851-00042

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

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

Source Name: Rittal Electromate
 Source Address: 3065 East Water Street, Fremont, Indiana 46737
 Mailing Address: 301 West Water Street, Fremont, Indiana 46737
 FESOP No.: F151-17851-00042

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

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

Source Name: Rittal Electromate
Source Location: 301 West Water Street, Fremont Indiana 46737
County: Steuben
SIC Code: 3644
Operation Permit No.: F151-17851-00042
Permit Reviewer: Femi Ogunsola/EVP

On June 4, 2004, the Office of Air Quality (OAQ) had a notice published in the Herald Republican in Angola, Indiana, stating that Rittal Electromate had applied for a FESOP renewal relating to the operation of a stationary electrical enclosures fabrication, assembly and surface coating plant. The notice also stated that OAQ proposed to issue a permit renewal 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 permit renewal should be issued as proposed.

The public notice ended on August 6, 2004. The source has not submitted any comments and has confirmed they have no post public notice comments. However, upon further review, OAQ has determined the following changes will be made to the permit (where language deleted is shown with ~~strikeout~~ and that which is added is shown in **bold**):

- (1) Condition B.22 has been revised to reflect that the name of the Billing Section has been changed from I/M Billing section to Billing, Licensing and Training section.

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~I/M &~~ **Billing, Licensing and Training Section**), to determine the appropriate permit fee.

- (2) There is no section B.23 (Advance Source Modification Approval) in the permit. Section B.23 was mistakenly added to the list of subsections of Section B on the Table of Content. This error has been revised as follows:

SECTION B	GENERAL CONDITIONS	7
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.13	Emergency Provisions [326 IAC 2-8-12]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
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]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC13-14-2-2][IC13-30-3-1][IC 13-17-3-2]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	
B.23	Advanced Source Modification Approval [326 IAC 2-8-4 (11)][326 IAC 2-1.1-9]	

- (3) Condition D.1.6 has been revised to reflect recent update to this condition as follows:

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (BH3 and BH4) used in conjunction with the powder coating processes at booths (P-1 and P-3), at least once per shift when the powder coating processes at booths (P-1 and P-3) in operation when venting to the atmosphere. When for any one reading, the pressure drop across the each baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records and Reports**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

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

(4)

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of ~~daily~~ visible emission notations of the stack exhaust **once per shift**.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
 - (1) Once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.
- (d) To document compliance with Condition D.1.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: Rittal Electromate
Source Location: 301 West Water Street, Fremont, IN 46737
County: Steuben
SIC Code: 3644
Operation Permit No.: F151-17851-00042
Permit Reviewer: Femi Ogunsola/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Rittal Electromate relating to the operation of sheet metal fabrication plant to produce electrical enclosures. Rittal Electromate was issued FESOP 151-9421-00042 on October 16, 1998.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) manual powder coating spray booth, identified as P-1, using an air atomized application system, processing at a maximum of 42 metal enclosures per hour and spraying at a maximum capacity of 24 pounds of powder per hour, with a baghouse, identified as BH4, for particulate control, and exhausting at one (1) stack (S/V ID: NV17);
- (b) One (1) manual powder coating spray self-contained booth, identified as P-2, using four (4) air atomization spray guns, spraying at a maximum capacity of 24 pounds of powder per hour and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (c) One (1) high-volume electrostatic powder surface coating self-contained booth, identified as P-B, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (d) One (1) high-volume electrostatic powder surface coating self-contained booth, identified as P-C, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;

- (e) One (1) low-volume electrostatic powder surface coating booth, identified as P-3, equipped with two (2) manual powder spray guns, with a maximum capacity of spraying 14.2 pounds of powder per hour, utilizing a baghouse (BH3) for particulate control and exhausting through one (1) stack (S/V ID: NV3); and
- (f) One (1) surface powder coating self-contained booth, identified as P-4, consisting of two (2) high volume-low pressure (HVLP) spray guns with maximum capacity of 14.2 pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) one (1) air makeup unit rated at 5.39 MMBtu/hr;
 - (b) one (1) pretreatment process water heater rated at 0.938 MMBtu/hr;
 - (c) one (1) pretreatment process water heater rated at 0.789 MMBtu/hr;
 - (d) one (1) pretreatment dry-off oven rated at 0.4 MMBtu/hr;
 - (e) four (4) area heaters each rated at 0.4 MMBtu/hr;
 - (f) one (1) carrier burn-off oven rated at 0.30 MMBtu/hr;
 - (g) sixteen (16) infrared hanging heaters with a total rating of 0.96 MMBtu/hr;
 - (h) two (2) cure ovens each rated at 1.65 MMBtu/hr;
 - (i) one (1) dry off oven rated at 1.65 MMBtu/hr;
 - (j) one (1) HV cure oven rated at 3.10 MMBtu/hr;
 - (k) one (1) cure oven rated at 3.00 MMBtu/hr; and
 - (l) one (1) HVAC unit rated at 0.45 MMBtu/hr.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
 - (1) one (1) waste-oil fired heater rated at 0.225 MMBtu/hr
- (c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) spot welding of metal enclosures
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (g) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:
 - (1) one (1) fully enclosed sand blasting cabinet, identified as SB1, utilizing a baghouse (BH7) for particulate control;
 - (2) fifteen (15) hand grinders;
 - (3) fifteen (15) hand polishers;
 - (4) one (1) wheel grinder;
 - (5) three (3) fully enclosed sand blasting cabinet, identified as SB2, fully self-contained;
 - (6) seventeen (17) six-inch belt sanders utilizing a baghouse (BH5) for particulate control;
 - (7) one (1) inert gas laser cutter utilizing a baghouse for particulate control; and
 - (8) two (2) wheel grinders.

- (h) The following emission units with VOC emissions below 5 pounds per hour or 15 pounds per day:
 - (1) one (1) three stage washer system utilizing non-VOC detergents; and

 - (2) one (1) pretreatment wash booth utilizing non-VOC detergents

- (i) Other categories with PM emissions below 5 pounds per hour or 25 pounds per day:
 - (1) seven (7) Metal Inert Gas (MIG) welding stations emitting less than 1 ton per year of a single HAP;
 - (2) six (6) Tungsten Inert Gas (TIG) welding stations emitting less than 1 ton per year of a single HAP;
 - (3) ten (10) MIG welding stations with PM emission less than 25 pounds per day;
 - (4) eight (8) TIG welding stations with PM emissions less than 25 pounds per day.

- (j) The following emission units emitting greater than 1 pounds per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - (1) one (1) gasket applicator robot identified as G-1; and
 - (2) one (1) gasket applicator robot identified as G-2.

Existing Approvals

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

- (a) Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review, FESOP 151-9421-00042, issued on October 16, 1998; and

- (b) First Reopening to Federally Enforceable State Operating Permit, R 151-13110-00042, issued on September 27, 2001.

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

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP Renewal application for the purposes of this review was received on June 19, 2003.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (5 pages Appendix A).

Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	greater than 250
PM ₁₀	greater than 100
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

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

HAP's	Unrestricted Potential Emissions (tons/yr)
Maganese	less than 10
TOTAL	less than 10

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

Potential to Emit After Issuance

The source, issued a FESOP on October 16, 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 this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (**F151-9421-00042**; issued on October 16, 1998) .

Process/emission unit	Potential to Emit After Issuance (tons/year)							
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single HAP	Combined Total
Powder Surface Coatings (P-B, P-C, P-1, P-2, P-3, P-4)	4.68 ⁽¹⁾	4.68 ⁽¹⁾	0.0	0.0	0.0	0.0	0.00	0.00
Insignificant Activities (including Blasting, Welding, Natural Gas Combustion, Machining, Grinding)	7.08	7.65	0.1	0.6	8.8	10.5	0.53 (Maganese)	0.73
Total PTE After Issuance	11.76	12.33	0.1	0.6	8.8	10.5	0.53	0.73

Note: ⁽¹⁾ Controlled emissions

County Attainment Status

The source is located in Steuben County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-hr Ozone	attainment
8-hr Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOX) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and Nox are considered when evaluating the rule applicability relating to the ozone standards. Steuben County has been designated as attainment or unclassifiable for the ozone standards. Therefore, VOC emissions and NOX were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section. .
- (b) Steuben County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO₂, CO and lead (Pb)pollutants. Therefore, these emissions were reviewed pursuant to the requirements of the Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 61) applicable to this source.
- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit, as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the pollutant-specific emissions unit meets the following criteria:

- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
- (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
- (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Steuben County and the potential to emit VOC and PM₁₀ is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate (PM) emission from the shotblasters identified as SB1 and SB2 shall each not exceed 1.29 pounds per hour when operating at an individual process weight flow rate of 354 pounds abrasive per hour. This particulate limitation was calculated using the following equation:

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:

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

$$E = 4.10 (354/2000)^{0.67} = 4.10 (0.177)^{0.67} = 1.29 \text{ pounds per hour.}$$

The controlled emissions for SB1 and SB2 are 0.09 pounds per hour each. Therefore, the shot blasters (SB1 and SB2) shall be in compliance with 326 IAC 6-3-2.

The baghouse for particulate control shall be in operation at all times the shotblaster (SB1) is in operation.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate (PM) emission from each powder coating operation P-B and P-C shall each not exceed 0.62 pounds per hour when operating at a process weight flow rate of 120 pounds of powder per hour. This particulate limitation was calculated using the following equation:

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:

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

$$E = 4.10 \times (0.06)^{0.67} = 0.62 \text{ pounds per hour.}$$

The powder booths (P-B and P-C) each have a controlled potential emission of 0.36 pounds per hour. Therefore, the powder booths (P-B and P-C) are in compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate (PM) emission rate from each powder coating operation, P-1, P-2, P-3 and P-4, shall not exceed 0.551 pounds per hour when operating at a process weight flow rate of less than 100 pounds of powder per hour

The powder booths (P-1 and P-3) each have a controlled potential emission of 0.51 pounds per hour. Therefore, the powder booths (P-1 and P-3) are in compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Particulate from the powder booths (P-1 and P-3) shall be controlled by baghouses (BH4 and BH3 respectively). The baghouses (BH4 and BH3) for particulate control shall be in operation at all times the powder booths (P-1 and P-3) are in operation in order to comply with this limit.

The powder booths (P-2 and P-4) have a controlled potential emission of 0.31 and 0.19 pounds per hour, respectively. Therefore, the powder booths (P-2 and P-4) are in compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Particulate from the powder booths (P-2 and P-4) shall be controlled each by a powder recovery system which comprises of vacuum filter array. These powder recovery systems shall be in operation with the vacuum filter array in place at all times the powder booths (P-2 and P-4) are in operation in order to comply with this limit.

Pursuant to 326 IAC 6-3-2(d), the source shall operate the baghouses for particulate emission control at powder booths (P-1 and P-3) and the powder recovery systems with their vacuum filter array for particulate emission control at powder booths (P-2 and P-4) in accordance with manufacturer's specifications.

- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate (PM) emission rate from the seventeen (17) belt sanders shall be limited according to the following equation:

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:

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

The particulate emissions from seventeen (17) belt sanders are controlled by a single baghouse (BH5). The controlled potential emissions from this baghouse is 0.22 pounds per hour. Therefore, the seventeen (17) belt sanders are in compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

- (e) Pursuant to 326 IAC 6-3-1 (b) (Particulate Emission Limitations for Manufacturing Processes), the particulate (PM) emission rate from the laser cutter, welding, grinding, and other miscellaneous machining operations are not subject to the requirements of 326 IAC 6-3-2 for the following reasons:
- (1) Welding operations: consumption of wire are less than six hundred twenty-five (625) pounds of rod or wire per day;
 - (2) Torch cutting: less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut;
 - (3) Other activities such as machining operations are trivial activities as defined at 326 IAC 2-7-1 (40).
- (f) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the portable dual grinder shall not exceed 1.02 pounds per hour when operating at a process weight flow rate of 250 pounds of raw materials per hour. This particulate limitation was calculated using the following equation:

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:

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

$$E = 4.10 \times (250/2000)^{0.67} = 4.10 \times (0.125)^{0.67} = 1.02 \text{ pounds per hour.}$$

This portable unit is controlled by a single baghouse (BH6). The potential PM emissions from this baghouse are 0.01 pounds per hour. Therefore, the portable dual grinder is in compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

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 baghouses controlling the powder coating booths P-1, and P-3 have applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the powder coating booths (P-1 and P-3) 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 deviation from this permit.
 - (2) The Permittee shall record the total static pressure drop across each baghouse (BH3 and BH4) used in conjunction with the powder coating booths operations , at least once per shift when the powder coating process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
 - (3) An inspection shall be performed each calendar quarter of all bags controlling the powder coating operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

- (b) The dry particulate vacuum filters controlling the powder coating booths P-2, P-4, P-B and P-C have applicable compliance monitoring conditions specified as follows:
- (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 powder coating booths (P-1 and P-3) stacks (NV 17 and NV3 respectively) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

- (c) The baghouse of the seventeen (17) six-inch belt sanders have applicable compliance monitoring conditions as specified below:
- (1) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shot blasting system is in operation, when venting to the atmosphere. When for any one reading, the pressure drop across each baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (2) An inspection shall be performed each calendar quarter of all bags controlling the sanding operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced

These monitoring conditions are necessary because the seventeen (17) six-inch belt sanders must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this metal enclosure fabrication plant shall be subject to the conditions of the attached proposed **FESOP No.: F151-17851-00042.**

Appendix A: Emission Calculations

Company Name: Rittal-Electromate
Address City IN Zip: 3065 East Water Street, Fremont, IN 46737
FESOP: 151-17851
Pit ID: 151-00042
Reviewer: Femi Ogunsola/EVP
Date: 11/07/03

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Powder Surface Coating	Abrasive Blasting	Natural Gas Combustion	Insignificant Activities Welding, Machining, Grinding etc.	TOTAL
PM	693.66	89.93	0.20	204.44	988.23
PM10	693.66	62.95	0.80	204.44	961.85
SO2	0.00	0.00	0.10	0.00	0.10
NOx	0.00	0.00	10.50	0.00	10.50
VOC	0.00	0.00	0.60	0.00	0.60
CO	0.00	0.00	8.80	0.00	8.80
total HAPs	0.00	0.00	0.191	8.48	8.67
worst case single HAP	0.00	0.00	0.189	8.48	8.67
Total emissions based on rated capacity at 8,760 hours/year.					
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Powder Surface Coating	Abrasive Blasting	Natural Gas Combustion	Insignificant Activities Welding, Grinding etc.	TOTAL
PM	4.68	0.10	0.20	6.78	11.76
PM10	4.68	0.07	0.80	6.78	12.33
SO2	0.00	0.00	0.10	0.00	0.10
NOx	0.00	0.00	10.50	0.00	10.50
VOC	0.00	0.00	0.60	0.00	0.60
CO	0.00	0.00	8.80	0.00	8.80
total HAPs	0.00	0.00	0.191	0.00	0.19
worst case single HAP	0.00	0.00	0.189	0.00	0.19
Total emissions based on rated capacity at 8,760 hours/year, after control.					

**Appendix A: Emissions Calculations
 Particulate Emission from Powder Coating
 From Surface Coating Operations**

**Company Name: Rittal-Electromate
 Address City IN Zip: 3065 East Water Street, Fremont, Indiana 46737
 FESOP: 151-17851
 Plt ID: 151-00042
 Reviewer: FO/EVP
 Date: 11/11/2003**

Material/Facility	Maximum Usage (lbs/hr)	Particulate Potential (ton/yr)	Transfer Efficiency
Manual Powder Booth, P-2	24.00	15.77	85%
High Volume Electrostatic Powder Booth, P-B	120.00	78.84	85%
High Volume Electrostatic Powder Booth, P-C	120.00	78.84	85%
Powder Booth, P-4	14.20	9.33	85%
Uncontrolled Potential Emissions		182.78	
Controlled Potential Emissions		3.66	

METHODOLOGY

Particulate Potential Tons per Year = Maximum Usage per hour (lbs/hour) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

NOTES

Controlled Potential Emission for particulate calculated using 98% control efficiency for all the equipment.

Appendix A: Process Particulate Emissions

Company Name: Rittal-Electromate
Address City IN Zip: 3065 East Water Street, Fremont, IN 46737
FESOP#: 151-17851
Plt ID: 151-00042
Reviewer: Femi Ogunsola/ EVP
Date: 11/7/2003

State Potential Emissions (tons/year)					
Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
BH3 for Powder Booth P-3	1	0.00200	6804.0	99.80%	255.44
BH4 for Powder Booth P-1	1	0.00200	6804.0	99.80%	255.44
BH5 for Seventeen (17) Belt Sanders	1	0.00500	5040.0	99.50%	189.22
BH6 for Portable Grinder	1	0.00310	405.6	99.50%	9.44
Total Emissions Based on Rated Capacity at 8,760 Hours/Year:					709.54
Federal Potential Emissions (tons/year)					
Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
BH3 for Powder Booth P-3	1	0.00200	6804.0	99.80%	0.51
BH4 for Powder Booth P-1	1	0.00200	6804.0	99.80%	0.51
BH5 for Seventeen (17) Belt Sanders	1	0.00500	5040.0	99.50%	0.95
BH6 for Portable Grinder	1	0.00310	405.6	99.50%	0.05
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls:					2.02

Methodology:**State Potential (uncontrolled):**

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Rittal-Electromate
Address City IN Zip: 3065 East Water Street, Fremont, IN 46737
Permit Number: 151-17851
Plt ID: 151-00042
Reviewer: Femi Ogunsola/EVP
Date: 11/07/03

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Submerged Arc											
Metal Inert Gas (MIG)(carbon steel)	17	170	0.0055	0.0005			0.935	0.085			0.085
Stick (E7018 electrode)											
Tungsten Inert Gas (TIG)(carbon steel)	14	70	0.0055	0.0005			0.385	0.035			0.035
Oxyacetylene(carbon steel)											
EMISSION TOTALS											
Potential Emissions lbs/hr							1.32				0.12
Potential Emissions lbs/day							31.68				2.88
Potential Emissions tons/year							5.78				0.53

METHODOLOGY

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

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

**Rittal-Electromate
3065 East Water Street, Fremont, IN 46737**

**Permit Number: 151-17851
Plt ID: 151-00042
Reviewer: Femi Ogunsola
Date: 11/07/2003**

Heat Input Capacity MMBtu/hr	Description of Units	Potential Throughput MMCF/yr
2.50	One (1) Dry Off Oven rated at 2.50 MMBtu/hr	21.90
3.10	One (1) Cure Oven rated at 3.10 MMBtu/hr	27.16
4.95	Three (3) Ovens each rated at 1.65 MMBtu/hr	43.36
3.00	One (1) Cure Oven rated at 3.00 MMBtu/hr	26.28
0.45	One (1) HVAC rated at 0.45 MMBtu/hr	3.94
0.96	Sixteen (16) infrared hanging heaters with a total of 0.96 MM Btu/hr	8.41
1.60	Four (4) heaters each rated at 0.4 MMBtu/hr	14.02
0.94	One (1) Pretreatment Process water heater rated at 0.938 MMBtu/hr	8.22
0.79	One (1) Pretreatment Process water heater rated at 0.789 MMBtu/hr	6.91
5.39	One (1) Air Makeup Unit rated at 5.39 MMBtu/hr	47.22
0.30	One (1) Burnoff Oven rated at 0.30 MMBtu/hr	2.63
23.98		210.04
	Total	

Criteria Pollutants Emissions	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.8	0.1	10.5	0.6	8.8

*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

HAPs emissions	HAPs - Organics				
	Benzene	Dichlorobenze	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.205E-04	1.260E-04	7.876E-03	1.890E-01	3.571E-04
HAPs emissions	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.251E-05	1.155E-04	1.470E-04	3.991E-05	2.205E-04

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Abrasive Blasting - SB1 and SB2

Company Name: Rittal-Electromate
 Address City IN Zip: 3065 East Water Street, Fremont, IN 46737
 FESOP: 151-17851
 Plt ID: 151-00042
 Reviewer: Femi Ogunsola/EVP
 Date: 11/07/2003

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 =

354
99
99
0.3125
0.3125

Flow Rate (FR) (lb/hr) = 354.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

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

0.029
354.000
0
2

Uncontrolled PM Emissions =	20.53 lb/hr
	89.93 ton/yr
Uncontrolled PM10 Emissions =	14.37 lb/hr
	62.95 ton/yr
Controlled PM Emissions =	0.10 lb/hr
	0.45 ton/yr
Controlled PM10 Emissions =	0.07 lb/hr
	0.31 ton/yr

NOTE: SB1 is controlled by baghouse BH7 which has a 99.5% collection efficiency.

SB2 is not controlled by a baghouse but fully self-contained but a controlled efficiency of 99.5% is assumed .

METHODOLOGY

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

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

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

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

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