



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 2, 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: Waupaca Pallet, Inc. / F123-18069-00022

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

**Waupaca Pallet, Inc.
11225 Solomon Road
Troy, Indiana 47588**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

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|---|--|
| Operation Permit No.: F123-18069-00022 | |
| Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: July 2, 2004 Expiration Date: July 2, 2009 |

SECTION A SOURCE SUMMARY 4

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

SECTION B GENERAL CONDITIONS 6

- 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][IC 13-17-3-2][IC13-30-3-1]
- B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
- 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]

SECTION C SOURCE OPERATION CONDITIONS 15

Emission 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]
- C.2 Overall Source Limit [326 IAC 2-8]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

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

- C.9 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

- C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Compliance Response Plan -Preparation, Implementation, Records, and Reports [326 IAC 2-8-4][326 IAC 2-8-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS - One (1) Dip Tank Line and One (1) Spray Paint Booth.....23

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

- D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]
- D.1.2 PSD Minor Limit [326 IAC 2-2]
- D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.4 Particulate Matter (PM) [40 CFR 52 Subpart P]
- D.1.5 Particulate [326 IAC 6-3-2(d)]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2]

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

- D.1.8 Monitoring

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

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

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|--|-----------|
| FESOP Certification Form..... | 27 |
| FESOP Emergency Occurrence Form | 28 |
| Quarterly Report Form..... | 30 |
| Quarterly Report Form..... | 31 |
| Quarterly Report Form..... | 32 |
| Quarterly Deviation and Compliance Monitoring Report Form | 33 |

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 painting operation consisting of dip tank painting and spray painting of metal parts. The Permittee also owns and operates a sand core-making operation that includes coating of the sand cores. The cores are sold to the metal foundry industry and used in the manufacture of castings at these foundries.

| | |
|-------------------------|--|
| Authorized individual: | Stacy Mittelstaedt-Drexler, Owner |
| Source Address: | 11225 Solomon Road, Troy, Indiana 47588 |
| Mailing Address: | N. 2467 Vaughn Road, Waupaca, WI 59481-9030 |
| General Source Phone: | (920) 892 - 4181 |
| SIC Code: | 3297, 3479 |
| Source Location Status: | Perry |
| Source Status: | Attainment for all criteria pollutants 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) dip tank line, identified as S01 P01, with a maximum production rate of 20,000 pounds per hour of iron castings and one (1) natural gas dip tank drying oven, with a maximum heat input rate of 8.5 million British thermal units (MMBtu) per hour, exhausting through stack ID # S01; and
- (b) One (1) spray paint booth, identified as S02 P02, with a maximum capacity of coating 720 metal parts per hour, using dry filters for particulate matter overspray control, and exhausting through stack ID No. S02.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

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

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

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

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

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

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

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

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

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

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

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than 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][IC 13-17-3-2][IC 13-17-3-2][IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, 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]

- (1) 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.
- (2) 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 (PSD) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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 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.9 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements 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.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 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.16 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.17 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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 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) dip tank line, identified as S01 P01, with a maximum production rate of 20,000 pounds per hour of iron castings and one (1) natural gas dip tank drying oven, with a maximum heat input rate of 8.5 million British thermal units (MMBtu) per hour, exhausting through stack ID # S01; and
- (b) One (1) spray paint booth, identified as S02 P02, with a maximum capacity of coating 720 metal parts per hour, using dry filters for particulate matter overspray control, and exhausting through stack ID No. S02.

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

Pursuant to 326 IAC 2-8-4 the total worst case and total combined HAPs input of the dip tank line and spray booth shall be limited to less than ten (10) and twenty five (25) tons per twelve (12) consecutive month period respectively with compliance determined at the end of each month. This limit is equivalent to less than ten (10) and twenty five (25) emission limits for worst case and combined HAPs, therefore, 326 IAC 2-7 do not apply.

D.1.2 VOC Limit [326 IAC 2-8][326 IAC 2-2]

Pursuant to 123-10565-00022, issued on June 24, 1999, the usage of VOC at the dip tank line and spray booth combined, including coatings, dilution solvents, and cleaning solvents shall be less than 99.8 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than one hundred (100) tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9][326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-1-2(a)(5) for the one (1) dip tank. The equivalent emission limits in units of kilograms of VOC per liter solids deposited (pounds of VOC per gallon solids deposited) for the one (1) dip tank, baseline transfer efficiencies, and baseline volume percent solids content of coatings are as follows:

| Miscellaneous Metal Coating Category | Equivalent Emission Limit kg/l (lbs/gal) | Baseline Transfer Efficiency | Baseline Volume Percent Solids |
|--|--|------------------------------|--------------------------------|
| Clear Coatings | 2.08 (17.3) | 60 % | 41.6% |
| Air Dried up to 90 ° C | 1.34 (11.2) | 60 % | 52.4% |
| Extreme Performance Coatings | 1.34 (11.2) | 60 % | 52.4% |
| All other coatings and coating systems | 1.01 (8.4) | 60 % | 59.2% |

Pursuant to 326 IAC 8-1-2(a)(5), miscellaneous metal coating operations, the limits are based on the following equation:

$$E = \frac{L}{[(1 - (L/D)) \times (T)]}$$

Where

- E = Equivalent emission limit (pounds of VOC per gallon of coating solids deposited)
- L = Actual VOC content (pounds of VOC per gallon coating, as applied)
- D = Actual density of VOC in coating (pounds per gallon of VOC)
- T = Actual measured transfer efficiency (transfer efficiency for dip coating is 100%)

The equivalent emission limit for dip coatings is 11.2 pounds of VOCs per gallon of coating solids deposited.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts or products in one (1) spray paint booth shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried, forced warm air dried, or extreme performance coatings.

Solvent used during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent use is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

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

Pursuant to 40 CFR 52 Subpart P, the PM from the one (1) spray paint booth (S02 P02) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) spray paint booth (S02 P02) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC and HAPs content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by obtaining from the manufacturer the copies of the "as supplied" Material Safety Data Sheets or product specification sheets, and maintaining records of all additions such that the "as applied" VOC concentration can be calculated. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the VOC and HAPs usages for the most recent twelve (12) consecutive month period.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (S02) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each day (or month);
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) Maintain the following records on a daily basis for each VOC-containing coating, solvent, or other material added to the tank:
- (1) The following parameters for each coating, thinner, or other material as supplied:
 - (A) The coating, thinner, or other material identification number
 - (B) The volume used
 - (C) The mix ratio
 - (D) The density or specific gravity
 - (E) The weight percent of total volatiles, water, solids and exempt solvents
 - (F) The volume percent of solids.
 - (1) Maintain all records necessary to confirm compliance:
 - (A) On-site for the most recent three (3) year period.
 - (B) Make reasonably accessible for an additional two (2) years.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 (c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Waupaca Pallet, Inc.
Source Address: 11225 Solomon Road, Troy, Indiana 47588
Mailing Address: N. 2467 Vaughn Road, Waupaca, WI 59481-9030
FESOP No.: 123-18069-00022

**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: Waupaca Pallet, Inc.
Source Address: 11225 Solomon Road, Troy, Indiana 47588
Mailing Address: N. 2467 Vaughn Road, Waupaca, WI 59481-9030
FESOP No.: 123-18069-00022

This form consists of 2 pages

Page 1 of 2

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

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

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

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

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N 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

FESOP Quarterly Report

Source Name: Waupaca Pallet, Inc.
 Source Address: 11225 Solomon Road, Troy, Indiana 47588
 Mailing Address: N. 2467 Vaughn Road, Waupaca, WI 59481-9030
 FESOP No.: F123-18069-00022
 Facility: One (1) Dip Tank Line (S01 P01) and One (1) Spray Paint Booth (S02 P02)
 Parameter: Single Worst Case Hazardous Air Pollutant (HAP)
 Limit: The single worst case HAP emission is limited to less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | Single Worst Case HAP Emission (tons) | | |
|---------|---------------------------------------|--------------------|---------------------|
| | Column 1 | Column 2 | Column 1 + Column 2 |
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Waupaca Pallet, Inc.
Source Address: 11225 Solomon Road, Troy, Indiana 47588
Mailing Address: N. 2467 Vaughn Road, Waupaca, WI 59481-9030
FESOP No.: F123-18069-00022
Facility: One (1) Dip Tank Line (S01 P01) and One (1) Spray Paint Booth (S02 P02)
Parameter: Total Combined Hazardous Air Pollutants (HAPs)
Limit: The total combined HAP emissions is limited to less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | Total Combined HAPs Emissions (tons) | | |
|---------|--------------------------------------|--------------------|---------------------|
| | Column 1 | Column 2 | Column 1 + Column 2 |
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Waupaca Pallet, Inc.
Source Address: 11225 Solomon Road, Troy, Indiana 47588
Mailing Address: N. 2467 Vaughn Road, Waupaca, WI 59481-9030
FESOP No.: F123-18069-00022
Facility: One (1) Dip Tank Line (S01 P01) and One (1) Spray Paint Booth (S02 P02)
Parameter: Volatile Organic Compounds (VOC)
Limit: The VOC usage is limited to less than 99.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | Total Volatile Organic Compounds (VOCs) Emissions (tons) | | |
|---------|--|--------------------|---------------------|
| | Column 1 | Column 2 | Column 1 + Column 2 |
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Waupaca Pallet, Inc.
Source Address: 11225 Solomon Road, Troy, Indiana 47588
Mailing Address: N. 2467 Vaughn Road, WI 59481-9030
FESOP No.:

Months: _____ to _____ Year: _____

Page 1 of 2

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".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

| | |
|--|--|
| Source Name: | Waupaca Pallet, Inc. |
| Source Location: | 11225 Solomon Road, Troy, Indiana 47588 |
| County: | Perry |
| SIC Code: | 3297, 3479 |
| Operation Permit No.: | 123-10565-00022 |
| Operation Permit Issuance Date: | June 24, 1999 |
| Permit Renewal No.: | 123-18069 |
| Permit Reviewer: | Femi Ogunsola/EVP |

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Waupaca Pallet, Inc. relating to the operation of dip tank painting castings, spray painting castings and sand core making processes to produce coated iron castings and coated foundry cores.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) dip tank line, identified as S01 P01, with a maximum production rate of 20,000 pounds per hour of iron castings and one (1) natural gas dip tank drying oven, with a maximum heat input rate of 8.5 million British thermal units (MMBtu) per hour, exhausting through stack ID # S01; and
- (b) One (1) spray paint booth, identified as S02 P02, with a maximum capacity of coating 20,000 metal parts per hour, using dry filters for particulate matter overspray control, and exhausting through stack ID No. S02.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units and pollution control equipment receiving advanced source modification approval at this source during this review process.

Insignificant Activities

This source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

Existing Approvals

The source has been operating under the previous FESOP 123-10565-00022 issued on June 24, 1999, with an expiration date of June 24, 2004, and the following amendments and revisions:

- (a) First Significant Permit Revision 123-13729-00022 issued on June 7, 2001.

All conditions from previous approvals were incorporated into this FESOP.

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 August 15, 2003.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 7 of 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 | <25 |
| PM-10 | <25 |
| SO ₂ | <25 |
| VOC | >250 |
| CO | <25 |
| NO _x | <25 |

| HAPs | Unrestricted Potential Emissions (tons/yr) |
|--------------|--|
| Xylene | >100 |
| Toluene | <100 |
| MIBK | <25 |
| EthylBenzene | >25 |
| Total | <250 |

Potential to Emit After Issuance

The source has opted to remain a FESOP source. 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 FESOP 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.

| Process/emission unit | Potential To Emit (tons/year) | | | | | | | |
|---|-------------------------------|------------------|-----------------|------------------|-------------|-----------------|-------------------|-----------------|
| | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs | |
| | | | | | | | Single Worst Case | Combined Total |
| Dip Tank Line (S01 P01) and Spray Booth (S02 P02) | 8.70 | 8.70 | 0.0 | <99.8 | 0.00 | 0.0 | <9.9 (Xylene) | <24.9 |
| Drying Oven | 0.3 | 0.3 | 0.0 | 0.2 | 3.1 | 3.7 | 0.1 | 0.1 |
| Total Emissions | 9.0 | 9.0 | 0.0 | <100.0 | 3.10 | 3.70 | <10.0 | <25.0 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC at this source is greater than 100 tons per year while for other regulated pollutant the potential to emit is less than 100 tons per year . Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels as indicated in the table above.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels as shown in the table above
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Perry County.

| Pollutant | Status |
|------------------|------------|
| PM ₁₀ | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Perry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Perry County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions 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.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Product [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980] due to its size. This source is a minor source of HAP since this source will limit single HAP and combination HAPs to less than 10 tons per year and 25 tons per year for single worst case HAP and combined total HAP respectively.
- (c) The dip tank line dry oven is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers and Process Heaters [40 CFR 63, subpart DDDD] due to its size. This facility single worst case hazardous air pollutant and total combination of hazardous air pollutant are insignificant.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source with the facilities, dip tank line (S01 P01) and the spray paint booth (S02 P02) at this source were constructed on December 1, 1998 and December 20, 2000 respectively, is not subject to 326 IAC 2-2 (Prevention of Significant Deterioration) because the source is located in Perry County, the source-wide federally enforceable limited potential to emit of any pollutant has always been maintained at less than 250 tons per year since the source started operation, and the source is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on October 17, 2001. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

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

The operation of one (1) dip tank line, identified as S01 P01, with one (1) natural gas dip tank oven and one (1) spray paint booth, identified as S02 P02 will emit less than 10 tons per year of any single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Perry County and the potential to emit of any regulated pollutant is less than one hundred (100) tons per year and the worst case single HAP and combination HAPs emissions are limited to less than ten (10) and twenty five (25) tons per year respectively. 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 Alternating Opacity Exemptions), opacity shall meet the following, unless otherwise stated in the 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.

326 IAC 2-8 (FESOP)

- (a) Pursuant to 326 IAC 2-8-2, this source which would otherwise be subject to the requirements of 326 IAC 2-7, has opted for a FESOP. Therefore the source is subject to the all applicable requirements of 326 IAC 2-8.
- (b) This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply:
 - (1) The total potential emission of volatile organic compounds (VOC) source-wide shall be limited to 100 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 - (2) The total potential emission of hazardous air pollutants (HAP) source-wide shall be limited such that the source-wide single HAP and total combined HAPs emissions shall not exceed ten (10) and twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Process Operations)

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

Pursuant to 40 CFR 52, Subpart P the particulate matter (PM) from the spray booth (S02 P02) shall be limited by the following:

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

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

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

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the source chooses to comply with this rule using the method outlined in 326 IAC 8-1-2(a)(9)(A) and (B) for the one (1) dip tank.

The equivalent emission limits in kilograms VOC per liter (lb/gallon) of coating solids is as follows:

| Miscellaneous Metal Coating Category | Limit in Kilograms VOC/liter (lb/gallon) of coating less water | Equivalent emission limit in kilograms VOC/liter (lb/gallon) of coating solids |
|---|--|--|
| Clear Coatings | 0.52 (4.3) | 1.22 (10.2) |
| Air Dried or forced warm air dried at temperatures up to ninety degrees Celsius (90 ° C) (one hundred ninety-four (194) degrees Fahrenheit) | 0.42 (3.5) | 0.80 (6.7) |
| Extreme Performance Coatings | 0.42 (3.5) | 0.80 (6.7) |
| All other coatings and coating application systems | 0.36 (3.0) | 0.61 (5.1) |

Compliance with the equivalent emission limit shall be determined by doing the following:

- (1) Calculate the VOC content of a dip coating or flow coating, expressed in units of weight of VOC per volume of coating solids, on a thirty (30) day rolling average basis using the following equation:

$$VOC = \left(\sum (W_{oi} \times D_{ci} \times Q_i) + \sum (W_{oJ} \times D_{dJ} \times Q_J) \right) / \left(\sum (V_{ni} \times Q_i) \right)$$

where: VOC_A = The as-applied, VOC content in pound VOC per gallon (lb VOC/gal) of coating solids for a dip coating or flow coating, calculated on a thirty (30) day rolling average basis.

W_{oi} = Percent VOC by weight of each as supplied coating (i) added to the dip coating or flow coating process, expressed as a decimal fraction (that is 55% = 0.55%).

D_{ci} = Density of each as supplied coating (i) added to the dip coating or flow coating process, in pounds per gallon.

Q_i = Quantity of each as supplied coating (i) added to the dip coating or flow coating process, in gallons.

V_{ni} = Percent solids by volume of each as supplied coating (i) added to the dip coating or flow coating process, expressed as a decimal fraction.

W_{oJ} = Percent VOC by weight of each thinner (J) added to the dip coating or flow coating process, expressed as a decimal fraction.

D_{dJ} = Density of each thinner (J) added to the dip coating or flow coating process, in pounds per gallon.

Q_J = Quantity of each thinner (J) added to the dip coating or flow coating process, in gallons.

(2) Maintain the following records on a daily basis for each VOC-containing coating, solvent, or other material added to the tank:

(A) The following parameters for each coating, thinner, or other material as supplied:

- (aa) The coating, thinner, or other material identification number
- (bb) The volume used
- (cc) The mix ratio
- (dd) The density or specific gravity
- (ee) The weight percent of total volatiles, water, solids and exempt solvents
- (ff) The volume percent of solids.

(B) Maintain all records necessary to confirm compliance:

- (aa) On-site for the most recent three (3) year period.
- (bb) Make reasonably accessible for an additional two (2) years.

The equivalent emission limit for both the Yenkin and Lilly coatings is 6.7 pounds of VOCs per gallon of coating solids deposited.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made (see page 6 of 7 Appendix A), the spray booth is in compliance with this requirement.

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 in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The one (1) spray booth (S02 P02) has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (S02) 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.

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

Conclusion

The operation of dip tank painting castings, spray painting castings and sand core making processes for the production of coated iron castings and coated foundry cores shall be subject to the conditions of the **FESOP 123-18069-00022**.

Indiana Department of Environmental Management

Office of Air Quality

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

Source Background and Description

Source Name: Waucapa Pallet, Inc.
Source Location: 11225 Solomon Road, Troy, IN 47588
County: Perry
SIC Code: 3297, 3479
Operation Permit No.: F123-18069-00022
Permit Reviewer: Femi Ogunsola / EVP

On May 3, 2004, the Office of Air Quality (OAQ) had a notice published in the Perry County News in Tell City, Indiana, stating that Waucapa Pallet, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate dip tank painting castings, spray painting castings and sand core making processing to produce coated iron castings and coated foundry cores. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

On May 21, 2004, Donald W. Becker of Alpha Terra Science on behalf of Waucapa Pallet, Inc., submitted comments on the proposed FESOP renewal permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted).

Comment 1

Waucapa Pallet requests that D.1.3 in the draft permit be replaced with the language that is similar to that in its present permit (Section D.1.5, Volatile Organic Compounds). The present draft permit states that the Waucapa Pallet chose to comply with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) using 326 IAC 8-1-2(a)(9)(A) and (B). Waucapa Pallet did not choose to comply using subpart (9), but rather chooses 326 IAC 8-1-2(a)(5) as its means of complying with 326 IAC 8-2-9.

Through phone conversations with Donald Poole, IDEM Permit Review Section, it is our understanding that any of the nine methods of demonstrating compliance with 326 IAC 8-2-9 as they are listed in 326 IAC 8-1-2(a) may be selected by the regulated entity. It is also our understanding from these phone conversations with Mr. Poole that the equivalent emission limit and the transfer efficiency, by selecting method (5), will be unchanged from our present permit. The equivalent emission limit in our present permit is 11.2 lbs of VOC per gallon of solids, and the transfer efficiency for dip coating is 100%.

If upon further review it is found that the emission limit will not stay at 11.2 lbs of VOC per gallon of solids but be reduced to the level in the current draft permit, Waupaca Pallet requests that new permit include a compliance schedule that will allow 9 months to convert coatings to be consistent with the lower limit and to obtain customer approval of each new coating. The typical time to complete the process of reformulation, testing at Waupaca Pallet, and customer testing and approval is 10-12 weeks for each coating.

Response to Comment 1

IDEM, OAQ agrees to change Condition D.1.3 as follows:

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [326 IAC 8-1-2]

- (a) Pursuant to ~~326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)~~, the source chooses to comply with this rule using the method outlined in ~~326 IAC 8-1-2(a)(9)(A) and (B)~~ **326 IAC 8-1-2(a)(5)** for the one (1) dip tank, the equivalent emission limits in kilograms VOC per liter (lb/gallon) of coating solids **deposited (pounds of VOC per gallon solids deposited) for the one (1) dip tank, baseline transfer efficiencies, and baseline volume percent solids content of coatings** are as follows:

| Miscellaneous Metal Coating Category | Limit in Kilograms VOC/liter (lb/gallon) of coating less water | Equivalent emission limit in kilograms VOC/liter (lb/gallon) of coating solids |
|--|--|--|
| Clear Coatings | 0.52 (4.3) | 1.22 (10.2) |
| Air Dried or forced warm air dried at temperatures up to ninety degrees Celsius (90 ° C) (one hundred ninety four (194) degrees Fahrenheit | 0.42 (3.5) | 0.80 (6.7) |
| Extreme Performance Coatings | 0.42 (3.5) | 0.80 (6.7) |
| All other coatings and coating application systems | 0.36 (3.0) | 0.61 (5.1) |

| Miscellaneous Metal Coating Category | Equivalent Emission Limit kg/l (lbs/gal solid) | Baseline Transfer Efficiency | Baseline Volume Percent Solids |
|--|--|------------------------------|--------------------------------|
| Clear Coatings | 2.08 (17.3) | 60 % | 41.6% |
| Air Dried up to 90 ° C | 1.34 (11.2) | 60 % | 52.4% |
| Extreme Performance Coatings | 1.34 (11.2) | 60 % | 52.4% |
| All other coatings and coating systems | 1.01 (8.4) | 60 % | 59.2% |

Pursuant to 326 IAC 8-1-2(a)(5), miscellaneous metal coating operations, the limits are based on the following equation:

$$E = \frac{L}{[(1 - (L/D))]}$$

Where

- E = Equivalent emission limit (pounds of VOC per gallon of coating solids deposited)
- L = Actual VOC content (pounds of VOC per gallon coating, as applied)
- D = Actual density of VOC in coating (pounds per gallon of VOC)
- T = Actual measured transfer efficiency (transfer efficiency for dip coating is 100%)

The equivalent emission limit for ~~both the Yenkin and Lilly coatings is 6.7~~ dip coatings is 11.2 pounds of VOCs per gallon of coating solids deposited.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal parts or products in one (1) spray paint booth shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried, forced warm air dried, or extreme performance coatings.

Solvent used during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent use is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Comment 2

Section D.1.7(c) of the draft permit specifies the use of a formula found in 326 IAC 8-1-2(a)(9). Since Waupaca Pallet wishes to demonstrate compliance using 326 IAC 8-1-2(a)(5), the formula should be formula found in subsection (5) of the rule.

Response to Comment 2

This source has opted to demonstrate compliance with 326 IAC 8-2-9 using 326 IAC 8-1-2(a)(5) instead of 326 IAC 8-1-2 (a) (9)(A) & (B). It is no longer necessary to use Condition D.1.7(c) to demonstrate compliance with Condition D.1.3. Therefore, IDEM, OAQ agrees to change Condition D.1.7 as follows:

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC and HAPs content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by ~~preparing or~~ obtaining from the manufacturer the copies of the "as supplied" and **Material Safety Data Sheets or product specification sheets, and maintaining records of all additions such that the "as applied" VOC data sheets** concentration can be calculated. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the VOC and HAPs usages for the most recent twelve (12) consecutive month period.

~~(c) Compliance with Condition D.1.3 the equivalent emission limit shall be determined by doing the following:~~

~~(1) Calculate the VOC content of a dip coating or flow coating, expressed in units of weight of VOC per volume of coating solids, on a thirty (30) day rolling average basis using the following equation:~~

$$VOC = \left(\sum (W_{oi} \times D_{ci} \times Q_i) + \sum (W_{oj} \times D_{dj} \times Q_j) \right) / \left(\sum (V_{ni} \times Q_i) \right)$$

~~where: VOC_A = The as-applied, VOC content in pound VOC per gallon (lb VOC/gal) of coating solids for a dip coating or flow coating, calculated on a thirty (30) day rolling average basis.~~

~~W_{oi} = Percent VOC by weight of each as supplied coating (i) added to the dip coating or flow coating process, expressed as a decimal fraction (that is 55% = 0.55%).~~

~~D_{ci} = Density of each as supplied coating (i) added to the dip coating or flow coating process, in pounds per gallon.~~

~~Q_i = Quantity of each as supplied coating (i) added to the dip coating or flow coating process, in gallons.~~

~~V_{ni} = Percent solids by volume of ach as supplied coating (i) added to the dip coating or flow coating process, expressed as a decimal fraction.~~

~~———— W_{eJ} = Percent VOC by weight of each thinner (J) added to the dip coating or flow coating process, expressed as a decimal fraction.~~

~~———— D_{dJ} = Density of each thinner (J) added to the dip coating or flow coating process, in pounds per gallon.~~

~~———— Q_J = Quantity of each thinner (J) added to the dip coating or flow coating process, in gallons.~~

Comment 3: A.1 General Information

The written description of the operations as it appears here and in the “Notice of 30-Day Period for Public Comment” is not correct. We recommend that the sentence that in the draft permit reads:

The Permittee owns and operates stationary dip tank painting castings, spray painting castings and sand core making processes to produce coated iron castings and coated foundry cores.

be revised to read as follows:

The Permittee owns and operates a painting operation consisting of dip tank painting and spray painting of metal parts. The Permittee also owns and operates a sand core-making operation that includes coating of the sand cores. The cores are sold to the metal foundry industry and used in the manufacture of castings at these foundries.

The Technical Support Document has the same language in multiple locations that should also be corrected.

Response to Comment 3

IDEM, OAQ agrees to change Section A.1- General Information as follows:

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

The Permittee owns and operates **a stationary painting operation consisting of dip tank painting eastings, and spray painting eastings of metal parts. The Permittee also owns and operates and sand core-making processes operation that includes coating of the sand cores to produce coated iron castings and coated foundry cores. The cores are sold to the metal foundry industry and used in the manufacture of castings at these foundries.**

| | |
|-------------------------|--|
| Authorized individual: | Stacy Mittelstaedt-Drexler, Owner |
| Source Address: | 11225 Solomon Road, Troy, Indiana 47588 |
| Mailing Address: | N. 2467 Vaughn Road, Waupaca, WI 59481-9030 |
| General Source Phone: | (920) 892 - 4181 |
| SIC Code: | 3297, 3479 |
| Source Location Status: | Perry |
| Source Status: | Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act |

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM, OAQ agrees that the introductory section of the TSD should have read as indicated below:

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Waucapa Pallet, Inc. relating to the painting operation consisting of dip tank painting and spray painting of metal parts. Waucapa Pallet, Inc. also owns and operates a sand core-making operation that includes coating of the sand cores. The cores are sold to the metal foundry industry and used in the manufacture of castings at these foundries.

IDEM, OAQ also agrees that the introductory section of the TSD should have read as indicated below:

Conclusion

The painting operation consisting of dip tank painting and spray painting of metal parts as well as the core-making operation that includes coating of the sand cores shall be subject to the conditions of the FESOP 123-18069-00022.

Comment 4: A.2 (b) Emission Units and Pollution Control Equipment Summary

This paragraph reads: "One (1) spray paint booth, identified as S02 P02, with a maximum capacity of coating 20,000 metal parts per hour, using..." etc. We are not certain how the 20,000 parts per hour figure was determined. However, this figure represents 5.6 parts per second, which is physically impossible for the system that is presently installed and operating. Spray painting one part every 5 or 6 seconds is about the maximum rate at which this system could operate. We recognize that this is probably not an important issue since the facility has elected to request a FESOP with enforceable limits that make the facility a minor source.

Paragraph (b) under this heading is identical to that found in A.2(b). Our comment with respect to the wording in this paragraph is the same as that for A.2(b) above.

The Technical Support Document has the same language in multiple locations that should also be corrected.

Response to Comment 4

IDEM, OAQ agrees to revise Section A.2 (b) and Item (b) in Section D.1, to indicate that the maximum coating rate is 720 metal parts per hour (equivalent to one (1) part every five (5) seconds) as follows:

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) dip tank line, identified as S01 P01, with a maximum production rate of 20,000 pounds per hour of iron castings and one (1) natural gas dip tank drying oven, with a maximum heat input rate of 8.5 million British thermal units (MMBtu) per hour, exhausting through stack ID # S01; and
- (b) One (1) spray paint booth, identified as S02 P02, with a maximum capacity of coating ~~20,000~~ **720** metal parts per hour, using dry filters for particulate matter overspray control, and exhausting through stack ID No. S02.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) dip tank line, identified as S01 P01, with a maximum production rate of 20,000 pounds per hour of iron castings and one (1) natural gas dip tank drying oven, with a maximum heat input rate of 8.5 million British thermal units (MMBtu) per hour, exhausting through stack ID # S01; and
- (b) One (1) spray paint booth, identified as S02 P02, with a maximum capacity of coating ~~20,000~~ **720** metal parts per hour, using dry filters for particulate matter overspray control, and exhausting through stack ID No. S02.

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

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

IDEM, OAQ agrees that the list of emission units in the TSD should have read as indicated below:

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) dip tank line, identified as S01 P01, with a maximum production rate of 20,000 pounds per hour of iron castings and one (1) natural gas dip tank drying oven, with a maximum heat input rate of 8.5 million British thermal units (MMBtu) per hour, exhausting through stack ID # S01; and
- (b) One (1) spray paint booth, identified as S02 P02, with a maximum capacity of coating **720 metal parts per hour**, using dry filters for particulate matter overspray control, and exhausting through stack ID No. S02.

Upon further review, IDEM, OAQ has decided to make the following changes:

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, ~~IM &~~ Billing, **Licensing, and Training** Section), to determine the appropriate permit fee.

Appendix A: Emission Calculations

Company Name: Waupaca Pallet, Inc.
Address City IN Zip: 11225 Solomon Road, Troy, Indiana 47588
CP: 123-18069
Plt ID: 123-00022
Reviewer: Femi Ogunsola/EVP
Date: 7/2/2004

| Uncontrolled Potential Emissions (tons/year) | | | | |
|---|--|-------------------------------|-------------------------------------|--------|
| Emissions Generating Activity | | | | |
| Pollutant | | Natural Gas Dip Tank Dry Oven | Dip Tank Line and Spray Paint Booth | TOTAL |
| PM | | 0.30 | 174.08 | 174.4 |
| PM10 | | 0.30 | 174.08 | 174.4 |
| SO2 | | 0.00 | 0.00 | 0.0 |
| NOx | | 3.70 | 0.00 | 3.7 |
| VOC | | 0.20 | 296.42 | 296.6 |
| CO | | 3.10 | 0.00 | 3.1 |
| total HAPs | | 0.10 | 166.68 | 166.8 |
| worst case single HAP | | 0.10 | 65.06 | 65.1 |
| Total emissions based on rated capacity at 8,760 hours/year. | | | | |
| Controlled Potential Emissions (tons/year) | | | | |
| Emissions Generating Activity | | | | |
| Pollutant | | Natural Gas Dip Tank Dry Oven | Dip Tank Line and Spray Paint Booth | TOTAL |
| PM | | 0.30 | 8.70 | 9.0 |
| PM10 | | 0.30 | 8.70 | 9.0 |
| SO2 | | 0.00 | 0.00 | 0.0 |
| NOx | | 3.70 | 0.00 | 3.7 |
| VOC | | 0.20 | <99.8 | <100.0 |
| CO | | 3.10 | 0.00 | 3.1 |
| total HAPs | | 0.10 | <24.9 | 0.1 |
| worst case single HAP | | 0.10 | <9.9 | 0.1 |
| Total emissions based on rated capacity at 8,760 hours/year, after control. | | | | |

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

**Company Name: Waupaca Pallet, Inc.
Address City IN Zip: 11225 Solomon Road, Troy, Indiana 47588
CP: 123-18069
Plt ID: 123-00022
Reviewer: Femi Ogunsola/EVP
Date: 07/02/04**

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| Yenkin P11900 | 9.80 | 44.69% | 0.0% | 44.7% | 0.0% | 52.24% | 0.00045 | 20,000 | 4.38 | 4.38 | 39.42 | 946.00 | 172.64 | 0.00 | 8.38 | 100% |
| Lilly 23G104A | 11.26 | 39.22% | 0.0% | 39.2% | 0.0% | 52.21% | 0.00045 | 20,000 | 4.42 | 4.42 | 39.75 | 953.89 | 174.09 | 0.00 | 8.46 | 100% |

* Coatings are mutually exclusive.

** In order to avoid the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control), the single and total HAP usage shall be less than 10 and 25 tons per year.
Yenkin Coating is worst case coating. Therefore, the single HAP usage is limited to 3.64% of the potential uncontrolled emissions (9.9/272.28 = 3.64%).

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total Worst Case Actual Usage (lb/day) = pounds of VOC per gallon less water * actual usage (gal/yr) * (1 yr/52 weeks) * (1 week/ 5 days)
Total Worst Case Actual Usage (ton/yr) = pounds of VOC per gallon less water * actual usage (gal/yr) * (1 ton/2000 pounds)

Compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The following calculations determine compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) using 326 IAC 8-1-2 (a)(9)(B):

$$E = \frac{L}{[(1-(L/D)) \times (T)]}$$

where: E = equivalent emission limit (lb/gallon of coating solids deposited)
L = actual VOC content (lb/gallon of coating, as applied)
D = actual density of VOC in coating (lb of VOC/gallon of VOC)
T = transfer efficiency

Yenkin P1190

L = 4.38 lb/gallon coatings
D = 7.18 lb of VOC/gallon of VOC
T = 100.00% (for dip application)
E = 11.2 lb/gallon of coating solids deposited This coating will comply with this limit.

Lilly 23G104A

L = 4.42 lb/gallon coatings
D = 7.28 lb of VOC/gallon of VOC
T = 100.00% (for dip application)
E = 11.2 lb/gallon of coating solids deposited This coating will comply with this limit.

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

Company Name: Waupaca Pallet, Inc.
Address City IN Zip: 11225 Solomon Road, Troy, Indiana 47588
CP: 123-18069
Plt ID: 123-00022
Reviewer: Femi Ogunsola/EVP
Date: 07/02/04

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % MIBK | Weight % Ethyl Benzene | Xylene Emissions (ton/yr) | Toluene Emissions (ton/yr) | MIBK Emissions (ton/yr) | Ethyl Benzene Emissions (ton/yr) | TOTAL EMISSIONS (tons/yr) | |
|--|------------------|--------------------------------|---------------------|-----------------|------------------|---------------|------------------------|------------------------------|------------------------------------|-------------------------------------|----------------------------------|---|--|
| Yenkin P1190 | 9.8 | 0.00045 | 20,000 | 16.84% | 15.47% | 1.95% | 3.33% | 65.06 | 59.76 | 7.53 | 12.86 | 145.22 | |
| Lilly 23G104A | 11.26 | 0.00045 | 20,000 | 12.69% | 0.00% | 0.00% | 2.90% | 56.33 | 0.00 | 0.00 | 12.87 | 69.20 | |
| Federal Potential Emissions (controlled): | | | | | | | | | | | | | |
| | | | | | | | | ** Material Usage Limitation | Limited Xylene Emissions (tons/yr) | Limited Toluene Emissions (tons/yr) | Limited MIBK Emissions (tons/yr) | Limited Ethyl Benzene Emissions (tons/yr) | LIMITED TOTAL EMISSIONS (tons/yr) |
| Total Federal Potential Emissions (Yenkin Coating): | | | | | | | | 15.22% | 9.90 | 9.09 | 1.15 | 1.96 | 22.10 |
| Total Federal Potential Emissions (Lilly Coating): | | | | | | | | | 8.57 | 0.00 | 0.00 | 1.96 | 10.53 |

* Coatings are mutually exclusive.

** In order to avoid the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control), the single and total HAP usage shall be less than 10 and 25 tons per year.

Yenkin Coating is worst case coating. Therefore, the single HAP usage is limited to 3.64% of the potential uncontrolled emissions (9.9/272.28 = 3.64%).

METHODOLOGY

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

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

**Company Name: Waupaca Pallet, Inc.
Address City IN Zip: 11225 Solomon Road, Troy, Indiana 47588
CP: 123-18069
Plt ID: 123-00022
Reviewer: Femi Ogunsola/EVP
Date: 07/02/04**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

8.5

74.5

Pollutant

| | PM | PM10 | SO2 | NOx | VOC | CO |
|-------------------------------|-----|------|-----|---------------------|-----|------|
| Emission Factor in lb/MMCF | 7.6 | 7.6 | 0.6 | 100.0 *see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 0.3 | 0.3 | 0.0 | 3.7 | 0.2 | 3.1 |

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

PM emission factors are condensable and filterable.

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

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

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

See page 2 for HAPs emissions calculations.

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

HAPs Emissions

**Company Name: Waupaca Pallet, Inc.
Address City IN Zip: 11225 Solomon Road, Troy, IN 47588
CP: 123-18069
Plt ID: 123-00022
Reviewer: Femi Ogunsola/EVP
Date: 07/02/04**

HAPs - Organics

| | | | | | |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 |
| Potential Emission in tons/yr | 0.0 | 0.0 | 0.0 | 0.1 | 0.0 |

HAPs - Metals

| | | | | | |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 |
| Potential Emission in tons/yr | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

Methodology is the same as page 1.

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

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

Company Name: Waupaca Pallet, Inc.
Address City IN Zip: 11225 Solomon Road, Troy, Indiana 47588
Permit Number 123-18069-00022
Pit ID: 123-00022
Reviewer: Femi Ogunsola/EVP
Date: 02/24/2004

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|-----------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| Valspar AAW0378 | 13.10 | 26.00% | 0.0% | 26.0% | 0.0% | 52.00% | 0.00041 | 20000.000 | 3.41 | 3.41 | 27.93 | 670.30 | 122.33 | 174.08 | 6.55 | 50% |
| Valspar WAA0164 | 11.95 | 20.15% | 1.3% | 18.9% | 24.4% | 51.89% | 0.00041 | 20000.000 | 2.98 | 2.25 | 18.47 | 443.31 | 80.90 | 171.36 | 4.34 | 50% |

Potential Emissions

27.93 670.30 122.33 174.08

Potential Emissions (controlled):

| | |
|---------------------|-----------------------|
| Control Efficiency: | Controlled PM tons/yr |
| PM | |
| 95.00% | 8.70 |

Total Federal Potential Emissions:

Note: Coatings are mutually exclusive. Potential to emit uses worse case coating (Valspar AAW0378).

METHODOLOGY

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

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

Company Name: Waupaca Pallet, Inc.
Address City IN Zip: 11225 Solomon Road, Troy, Indiana 47588
SPR#: 123-18069-00022
Plt ID: 123-00022
Permit Reviewer: Femi Ogunsola/EVP
Date: 02/25/04

| Material | Density (Lb/Gal) | Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Xylene Emissions (ton/yr) |
|-----------------|---------------------|------------------------|------------------------|--------------------|------------------------------|
| Valspar WAA0164 | 11.95 | 0.000410 | 20000.00 | 5.00% | 21.46 |

Total State Potential Emissions

21.46

METHODOLOGY

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