



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

June 9, 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: Carman Industries, Inc. / 019-19012-00088  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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June 9, 2004

Mr. David Adams  
Carman Industries, Inc.  
1005 West Riverside Drive  
Jeffersonville, IN 47130

Re: **019-19012-00088**  
First Administrative Amendment to  
CP No. 019-9372-00088

Dear Mr. Adams:

Carman Industries, Inc., was issued a construction permit on April 8, 1999, for a steel material handling equipment manufacturing source. An application was received April 5, 2004, requesting that the emission statement condition be removed from the permit due to the revisions to 326 IAC 2-6 (Emission Reporting) which became effective on March 27, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement condition will be removed from the permit. Pursuant to the provisions of **326 IAC 2-5.1-3** the permit is hereby administratively amended as follows:

The following conditions is deleted from the permit and the remaining conditions renumbered:

Annual Emission Reporting

8. ~~That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:~~  
~~Indiana Department of Environmental Management~~  
~~Technical Support and Modeling Section, Office of Air Quality~~  
~~100 North Senate Avenue, P. O. Box 6015~~  
~~Indianapolis, Indiana 46206-6015~~  
~~The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30~~

The name of IDEM's "Office of Air Management" was changed to "Office of Air Quality" on January 1, 2001. All references to "Office of Air Management" in the permit pages have been changed to "Office of Air Quality" and all references to "OAM" have been changed to "OAQ".

All other conditions of the permit shall remain unchanged and in effect. Please find a copy of the construction permit with the revisions.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janet Mobley at 317-232-8369 or at 1-800 451-6027 extension 2-8369.

Sincerely,  
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

PD/jm

cc: File – Clark County  
Clark County Health Department  
Air Compliance Section Inspector – Ray Schick  
Compliance Data Section  
Permit Review Section II- Janet Mobley

**CONSTRUCTION PERMIT  
OFFICE OF AIR QUALITY**

**Carman Industries, Inc.  
1005 West Riverside Dr.  
Jeffersonville, Indiana 47130**

is hereby authorized to construct and operate a steel material handling equipment manufacturing facility, consisting of the following:

- (a) one (1) paint spray booth, identified as S-1, utilizing an air atomized spray application system, with a maximum capacity of 481.77 pounds of coating per hour using dry filters for particulate control, exhausting through stack #S-1;
- (b) eleven (11) welding stations, utilizing metal inert gas, with a maximum hourly consumption of 3.73 pounds of wire per hour at each station;
- (c) one (1) flame-cutting station, utilizing oxyacetylene, with a maximum metal cutting rate of 20 inches per minute; and
- (d) one (1) sand blasting room, identified as S-2, utilizing a mechanical blaster, with a maximum blast rate of 1000 pounds of Black Beauty abrasives per hour, using a dust collector for particulate matter control, exhausting through stack #S-2.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-019-9372-00088	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 8, 1999 Expiration Date: November 3, 2004

First Notice Only Change No.: 019-19012-00088	Condition Affected: Number 8 is deleted and remaining conditions renumbered
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:June 9, 2004

## Construction Conditions

### General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Quality (OAQ).
2. That this permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.
4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
  - (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
  - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
  - (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).
  - (e) Pursuant to 326 IAC 2-1-4, the Permittee shall apply for an operation permit renewal at

least ninety (90) days prior to the expiration date established in the validation letter. The operation permit issued shall contain as a minimum the conditions in the Operation Conditions section of this permit.

## **Operation Conditions**

### General Operation Conditions

1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Quality (OAQ).
2. That the permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

### Preventive Maintenance Plan

3. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:
  - (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
  - (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
  - (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval.

### Transfer of Permit

4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):
  - (a) In the event that ownership of this steel material handling equipment manufacturing facility is changed, the Permittee shall notify OAQ, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
  - (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
  - (c) The OAQ shall reserve the right to issue a new permit.

### Permit Revocation

5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:
  - (a) Violation of any conditions of this permit.

- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

6. That pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM or other public official having jurisdiction.

Malfunction Condition

7. That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

8. Opacity Limitations

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

Particulate Matter Limitation

9. That pursuant to 326 IAC 6-3 (Process Operations), the dust collector shall be in operation at all times when the shot blasting room is in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 3.23 pounds per hour.

That pursuant to 326 IAC 6-3 (Process Operations), the PM from the one (1) paint booth (S-1) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

The dry filters for PM control shall be in operation at all times when the one (1) spray booth (S-1) is in operation.

Volatile Organic Compound (VOC) Limitation

10. That input of VOC to coating booth (S-1), including clean up solvents, shall not exceed 15 pounds per day, which is equivalent to 15 pounds per day actual VOC emissions. Therefore, requirements of 326 IAC 8-2-9 will not apply.

Visible Emission Notations

11. That visible emission notations of all exhaust to the atmosphere from dust collectors shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal.
- (a) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time, the process is in operation, not counting start up or shut down time.
- (b) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.
- (c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal and abnormal visible emissions for that specific process.
- (d) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Record Keeping Requirements

12. To document compliance with Operating Condition #12, the Permittee shall maintain records in accordance with (a) through (e) below. Records maintained for (a) through (e) shall be complete and sufficient to establish compliance with the VOC usage limits established in Operating

Condition #12:

- (a) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (b) A log of the dates of use;
- (c) The cleanup solvent usage for each day;
- (d) The total VOC usage for each day; and
- (e) The weight of VOCs emitted for each compliance period.

Reporting Requirements

13. That a log of information necessary to document compliance with operation permit condition no. 12 shall be maintained. These records shall be kept for at least the past 36 month period and made available upon request to the Office of Air Quality (OAQ).

- (a) A quarterly summary 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

within thirty (30) calendar days after end of the reporting period in the format attached. These records shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use for booth # S-1.

- (b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:
  - (i) 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.
  - (ii) If the document is submitted by any other means, it shall be considered timely if it is received and stamped by IDEM, OAQ on or before the date it is due.
- (c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

- (e) The first report shall cover the period commencing the postmarked submission date of the Affidavit of Construction.

Open Burning

14.

That 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.

**MALFUNCTION REPORT**  
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF Air Quality**  
**FAX NUMBER - (317) 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ? \_\_\_\_\_, 100 LBS/HR VOC ? \_\_\_\_\_, 100 LBS/HR SULFUR DIOXIDE ? \_\_\_\_\_ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ? \_\_\_\_\_ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON THE NEXT PAGE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Carman Industries, Inc. PHONE NO. (812) 288-4731

LOCATION: (CITY AND COUNTY) Jeffersonville, Clark County

PERMIT NO. 019-9372 AFS PLANT ID: 019-00088 AFS POINT ID: \_\_\_\_\_ INSP: Dave Holder  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/19 \_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/19 \_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

**Please note - This form should only be used to report malfunctions  
applicable to Rule 326 IAC 1-6 and to qualify for  
the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1                      Applicability of rule**

Sec. 1.        The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO<sub>2</sub>, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

**326 IAC 1-2-39                      “Malfunction” definition**

Sec. 39.       Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

\***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

## Indiana Department of Environmental Management Office of Air Quality Compliance Data Section

### Quarterly Report

Company Name: Carman Industries, Inc.  
Location: 1005 West Riverside Dr., Jeffersonville, IN 47130  
Permit No.: CP-019-9372-00088  
Source: paint spray booth, S-1  
Pollutant: VOC  
Limit: actual VOC emissions to less than 15 pounds per day

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	VOC Usage this day (pounds/day)	Day	VOC Usage this day (pounds/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		<b>TOTAL</b>	

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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