



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 6, 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: Bootz Manufacturing Company / 163-19148-00011

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.

Joseph E. Kernan
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July 6, 2004

Mr. Thomas Bootz
Bootz Manufacturing Company
P.O. Box 18010
Evansville, Indiana 47719

Re: 163-19148
Fourth Administrative Amendment to
Part 70 163-6551-00011

Dear Mr. Bootz:

Bootz Manufacturing Company was issued a permit on June 16, 1999 for a fabricated metal bathtub, sink, and lavatory manufacturing operation. A letter requesting an amendment was received on April 7, 2004. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (added language in bold, deletions in strikeout):

- 1. The following boilers have been removed since the original Title V permit was issued: one (1) 3.0 MMBtu per hour boiler, one (1) 1.5 MMBtu per hour boiler, and one (1) 1.0 MMBtu per hour boiler. These boilers, which were insignificant activities, were not specifically regulated in the Title V permit and were therefore not listed in the original Title V permit so no changes to the permit are necessary.
2. In Section A.1, General Information, the mailing address should be P.O. Box 18010, Evansville, Indiana 47719. Therefore, section A.1 is revised to read as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fabricated metal bath tub, sink, and lavatory manufacturing operation.

Responsible Official: Thomas Bootz, Vice President of Engineering
Source Address: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
Mailing Address: P.O. Box 640918010, Evansville, Indiana 477129
Phone Number: 812-429-2240
SIC Code: 3469
County Location: Vanderburgh
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

- 3. In the first Administrative Amendment (AA 163-10961-00011) issued to Bootz Manufacturing on September 21, 1999, changes were made to Section A.2. In the second Administrative Amendment (AA 163-14995-00011) issued on October 23, 2001, Section A.2 was erroneously changed to the original language of the Title V permit. The language should read as it did after the appropriate changes were made in 1999. Section A.2, item (a) under Plant #2, is revised to read as follows:

- (a) Two (2) Largeware Porcelain Enamel booths, ~~the ground coat and the top coat booths,~~ which are capable of coating 165 units per hour. These booths are equipped ~~with eight (8) air atomization spray systems,~~ with water wash spray to control the Particulate Matter (PM) overspray from ~~the ground coat~~ **one** booth and a dust collector to control the PM overspray from the ~~top coat~~ **other** booth, both exhausting to stack S/V 7;

The facility description in section D.2 is also revised as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant #2

- (a) Two (2) Largeware Porcelain Enamel booths, ~~the ground coat and the top coat booths,~~ which are capable of coating 165 units per hour. These booths are equipped ~~with eight (8) air atomization spray systems,~~ with water wash spray to control the Particulate Matter (PM) overspray from ~~the ground coat~~ **one** booth and a dust collector to control the PM overspray from the ~~top coat~~ **other** booth, both exhausting to stack S/V 7;
- (b) One (1) Urea Foam spray booth, capable of coating 7 units per hour. This booth is equipped with an air atomization spray system, with dry filters to control the PM over spray, exhausting to stack S/V 1; and
- (c) One (1) natural gas-fired Largeware furnace, which is rated at 11.7 million British thermal units per hour (MMBtu/hr) and one (1) natural gas-fired Smallware furnace, which is rated at 4.6 MMBtu/hr.

4. There are also two parts of Section A.2 that were added in Significant Source Modification No. 163-11340-00011, issued on November 15, 1999, but have been erroneously removed in the second Administrative Amendment (AA 163-14995-00011) issued on October 23, 2001. Both are still in Section D but need to be added to the descriptive information of Section A. Section A.2 is further revised to read as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

Plant #2

- (a) Two (2) Largeware Porcelain Enamel booths, which are capable of coating 165 units per hour. These booths are equipped with water wash spray to control the Particulate Matter (PM) overspray from one booth and a dust collector to control the PM overspray from the other booth, both exhausting to stack S/V 7;
- (b) One (1) Urea Foam spray booth, capable of coating 7 units per hour. This booth is equipped with an air atomization spray system, with dry filters to control the PM over spray, exhausting to stack S/V 1;
- (c) One (1) natural gas-fired Largeware furnace, which is rated at 11.7 million British thermal units per hour (MMBtu/hr) and one (1) natural gas-fired Smallware furnace, which is rated at 4.6 MMBtu/hr.
- (d) **one (1) porcelain enamel cover coat spray booth capable of coating 265 units per hour, with particulate matter overspray emissions controlled by a dust collector then exhausted back into the booth.**
- (e) **one (1) 12.35 million BTU/hr natural gas-fired porcelain furnace.**

5. References to stacks S/V 6 and S/V 8 in Condition D.2.7(a) have been removed as they no longer exist.

D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters, the water wash spray and the dust collector. To monitor the performance of the dry filters, the water wash spray and the dust collector, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V-1, ~~S/V-6, and S/V-7,~~ and S/V-8) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Trish Earls, at (973) 575-2555, ext. 3219 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments TE/EVP

cc: File – Vanderburgh County
U.S. EPA, Region V
Vanderburgh County Health Department
Evansville EPA
IDEM Southwest Regional Office
Air Compliance Section Inspector Scott Anslinger
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michelle Boner



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**PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY
And EVANSVILLE ENVIRONMENTAL PROTECTION
AGENCY**

**Bootz Manufacturing Company
1400 Park Street, Evansville, Indiana 47719 (Plant #1)
2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)**

(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.

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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-6551-00011	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 16, 1999 Expiration Date: June 16, 2004
First Administrative Amendment No.: 163-10961-00011, issued on September 21, 1999; First Significant Source Modification No.: 163-11340-00011, issued on November 15, 1999; Second Administrative Amendment No.: 163-14995-00011, issued on October 23, 2001; First Reopening No.: 163-13500-00011, issued on November 1, 2001; Third Administrative Amendment No.: 163-11560-00011, issued on July 14, 2003.	
Fourth Administrative Amendment No.: 163-19148-00011 Pages Affected: 5, 6, 32, 33	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 6, 2004

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Evansville EPA. 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fabricated metal bathtub, sink, and lavatory manufacturing operation.

Responsible Official: Thomas Bootz, Vice President of Engineering
Source Address: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
Mailing Address: P.O. Box 18010, Evansville, Indiana 47719
Phone Number: 812-429-2240
SIC Code: 3469
County Location: Vanderburgh
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

Plant #2

- (a) Two (2) Largeware Porcelain Enamel booths, which are capable of coating 165 units per hour. These booths are equipped with water wash spray to control the Particulate Matter (PM) overspray from one booth and a dust collector to control the PM overspray from the other booth, both exhausting to stack S/V 7;
- (b) One (1) Urea Foam spray booth, capable of coating 7 units per hour. This booth is equipped with an air atomization spray system, with dry filters to control the PM overspray, exhausting to stack S/V 1;
- (c) One (1) natural gas-fired Largeware furnace, which is rated at 11.7 million British thermal units per hour (MMBtu/hr) and one (1) natural gas-fired Smallware furnace, which is rated at 4.6 MMBtu/hr.
- (d) one (1) porcelain enamel cover coat spray booth capable of coating 265 units per hour, with particulate matter overspray emissions controlled by a dust collector then exhausted back into the booth.
- (e) one (1) 12.35 million BTU/hr natural gas-fired porcelain furnace.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million (MM) British thermal units (Btu) per hour including:
 - (1) one (1) permitted 6.695 MMBtu per hour natural gas fired boiler exhausting at one (1) stack, identified as S/V-7.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Plant #2

- (a) Two (2) Largeware Porcelain Enamel booths, which are capable of coating 165 units per hour. These booths are equipped with water wash spray to control the Particulate Matter (PM) overspray from one booth and a dust collector to control the PM overspray from the other booth, both exhausting to stack S/V 7;
- (b) One (1) Urea Foam spray booth, capable of coating 7 units per hour. This booth is equipped with an air atomization spray system, with dry filters to control the PM over spray, exhausting to stack S/V 1;
- (c) One (1) natural gas-fired Largeware furnace, which is rated at 11.7 million British thermal units per hour (MMBtu/hr) and one (1) natural gas-fired Smallware furnace, which is rated at 4.6 MMBtu/hr.

(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 2-7-5(1)]

D.2.1 Particulate Matter (PM) and Particulate Matter Less Than 10 Microns (PM-10) [326 IAC 2-2]

Total PM and PM-10 emissions from the one (1) Urea Foam spray booth shall be limited to less than 5.70 and 3.42 pounds per hour, respectively, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

D.2.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the PM emissions from Urea Foam Spray Booth and Largeware Booths shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf). This is equivalent to a PM emission rate of 3.7 pounds per hour for each booth.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the Urea Foam Spray Booth and Largeware Booths 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:

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

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(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.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or Evansville EPA, compliance with the PM limits specified in Conditions D.2.1 and D.2.2 and the PM-10 limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Particulate Matter (PM)

The dry filters in the Urea Foam Spray Booth and Largeware Booths for PM control shall be in operation at all times when Urea Foam Spray Booth and the Largeware Booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters, the water wash spray and the dust collector. To monitor the performance of the dry filters, the water wash spray and the dust collector, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V-1 and S/V-7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.