INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: March 6, 2006

RE: Armor Metal Group / 077-19848-00007

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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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
FNTVOP.dot 1/10/05

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Armor Metal Group Madison, Inc.
1200 Clifty Drive
Madison, Indiana 47250

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T077-19848-00007	
Issued by: Original Signed By: Nisha Sizemore for Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 6, 2006 Expiration Date: March 6, 2011

TABLE OF CONTENTS

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 A1 through A3 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 metal container manufacturing source.

Responsible Official:	Frank Ahaus, General Manager
Source Address:	1200 Clifty Drive, Madison, Indiana 47250
Mailing Address:	1200 Clifty Drive, Madison, Indiana 47250
General Source Phone Number:	812-273-1121
SIC Code:	3444
County Location:	Jefferson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor 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 station source consists of the following emission units and pollution control devices:

(a) One (1) container line prime booth, identified as EU-01A, installed in 1960, with a maximum capacity of 976 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, exhausting through Stack S1.

(b) One (1) container line OD booth, identified as EU-01B, installed in 1960, with a maximum capacity of 976 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, installed in 1960, exhausting through Stack S2.

(c) One (1) container line auto booth, identified as EU-01C, installed in 1977, with a maximum capacity of 976 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, installed in 1977, exhausting through Stack S3.

(d) One (1) commercial line prime application and topcoat booth, identified as EU-01D, installed in 1971, with a maximum capacity of 1,116 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, installed in 1971, exhausting through Stacks S4 and S5.

(e) One (1) container line touch-up booth, identified as EU-01E, installed in 1971, with a maximum capacity of 50 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, exhausting through Stack S8.

(f) One (1) commercial line touch-up booth, identified as EU-01F, installed in 1971, with a maximum capacity of 55.8 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, exhausting through Stacks S6 and S7.

(g) One (1) stencil area, identified as EU-01G, installed in 1975, with a maximum capacity of 2,092 metal containers per hour, utilizing a brush application method, exhausting through general ventilation.

(h) One (1) glue area, identified as EU-01H, installed in 1975, with a maximum capacity of 403 metal containers per hour, utilizing a brush application method, exhausting through general ventilation.

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) One (1) flame-cutting station with a maximum metal cutting rate of 12 inches per minute. [326 IAC 6-3]

(b) Grinding and machining operations controlled with fabric filters, with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]

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

This station 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);

(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 B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)[IC 13-15-3-6(a)]

(a) This permit, T077-19848 -00007, 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 of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Terms of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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, United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 “responsible official” as defined by 326 IAC 2-7-1(34). 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(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 a responsible official 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. One (1) certification may cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(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
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(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 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(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) 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 "responsible official" as defined by 326 IAC 2-7-1(34).

(c) 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.11 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 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
Indianapolis, Indiana 46204-2251

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

(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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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 2-7 and any other applicable rules.

(g) 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.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T077-19848-00007 and issued

pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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
Indianapolis, Indiana 46204-2251

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 not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-9(a)(3)]

(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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) 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) 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 2-7 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 being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(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.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modification correct involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in 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
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document, all such changes and emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at 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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

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 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.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 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
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-6(1)]

C.8 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
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

(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 "responsible official" as defined by 326 IAC 2-7-1(34).

(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.9 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.

(b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.

C.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 2-7-5] [326 IAC 2-7-6]

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
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-5(12)] [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 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(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.19 General Reporting Requirements [326 IAC 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

(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
Indianapolis, Indiana 46204-2251

(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 "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 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 2-7-5(15)]:

(a) One (1) container line prime booth, identified as EU-01A, installed in 1960, with a maximum capacity of 976 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, exhausting through Stack S1.

(b) One (1) container line OD booth, identified as EU-01B, installed in 1960, with a maximum capacity of 976 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, installed in 1960, exhausting through Stack S2.

(c) One (1) container line auto booth, identified as EU-01C, installed in 1977, with a maximum capacity of 976 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, installed in 1977, exhausting through Stack S3.

(d) One (1) commercial line prime application and topcoat booth, identified as EU-01D, installed in 1971, with a maximum capacity of 1,116 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, installed in 1971, exhausting through Stacks S4 and S5.

(e) One (1) container line touch-up booth, identified as EU-01E, installed in 1971, with a maximum capacity of 50 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, exhausting through Stack S8.

(f) One (1) commercial line touch-up booth, identified as EU-01F, installed in 1971, with a maximum capacity of 55.8 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, exhausting through Stacks S6 and S7.

(g) One (1) stencil area, identified as EU-01G, installed in 1975, with a maximum capacity of 2,092 metal containers per hour, utilizing a brush application method, exhausting through general ventilation.

(h) One (1) glue area, identified as EU-01H, installed in 1975, with a maximum capacity of 403 metal containers per hour, utilizing a brush application method, exhausting through general ventilation.

(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.1.1. General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after January 2, 2004.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.7, Notification Requirements.

D.1.2. National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.7, Notification Requirements.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;
(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

D.1.3 Particulate Matter [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2 (d), particulate matter (PM) from the EU-01A, EU-01B, EU-01C, EU-01D, EU-01E and EU-01F shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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 Monitoring Requirements

D.1.5 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3, S4, S5, S6, S7, and S8) while one of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be

considered a deviation from this permit.

(b) Monthly inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed. The Permittee shall take reasonable steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.6 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after January 2, 2004, whichever is later. For an existing affected source, the Permittee must submit the initial notification no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.3881(e)(2) to constitute compliance with this subpart for the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.7 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than April 2, 2006.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(b) All records shall be maintained in according with Section C-General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) One (1) flame-cutting station with a maximum metal cutting rate of 12 inches per minute.

(b) Grinding and machining operations controlled with fabric filters, with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations

(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) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the flame-cutting, grinding and machining operations shall not exceed the pound per hour emission rate established as E in the following equation:

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Armor Metal Group Madison, Inc
Source Address: 1200 Clifty Drive, Madison, Indiana 47250
Mailing Address: 1200 Clifty Drive, Madison, Indiana 47250
Part 70 Permit No.: T077-19848-00007

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Armor Metal Group Madison, Inc
Source Address: 1200 Clifty Drive, Madison, Indiana 47250
Mailing Address: 1200 Clifty Drive, Madison, Indiana 47250
Part 70 Permit No.: T077-19848-00007

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- C 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
- C 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
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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Armor Metal Group Madison, Inc
Source Address: 1200 Clifty Drive, Madison, Indiana 47250
Mailing Address: 1200 Clifty Drive, Madison, Indiana 47250
Part 70 Permit No.: T077-19848-00007

Months: _____ **to** _____ **Year:** _____

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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:	

Page 2 of 2

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for the renewal of a Part 70 Operating Permit

Source Name:	Armor Metal Group Madison, Inc.
Source Location:	1200 Clifty Drive, Madison, Indiana 47250
County:	Jefferson
SIC Code:	3444
Operation Permit No.:	T077-19848-00007
Permit Reviewer:	LRT

On September 16, 2005, the Office of Air Quality (OAQ) had a notice published in the **The Madison Courier** located in 310 Courier Square, Madison, Indiana 47250, stating that Armor Metal Group Madison had applied for the renewal of a Part 70 Operating Permit to operate a metal container manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

(1) IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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)~~(b) 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 "responsible official" as defined by 326 IAC 2-7-1(34).

~~(d)~~ (c) 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.11 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 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
Indianapolis, Indiana 46204**-2251**

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

(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) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However,** IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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 2-7 and any other applicable rules.

(g) 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.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

(2) IDEM has clarified the Section B Operational Flexibility condition as follows:

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** 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
Indianapolis, Indiana 46204**-2251**

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**, on a rolling five (5) year basis,** which document~~, on a rolling five (5) year basis,~~ all such changes and emission~~s trading~~ **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e)**.** ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ **at** 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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

(3) The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. Therefore, Condition C.1(a) and D.1.3 has been removed. And since the requirements of the 326 IAC 6-3 that were effective June 12, 2002 are now federally enforceable, the last statement has been removed.

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

~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~(b)~~ Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. ~~This condition is not federally enforceable.~~

~~D.1.3 Particulate Matter (PM) [40 CFR Subpart P]~~

~~Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the EU-01A, EU-01B, EU-01C, EU-01D, EU-01E and EU-01F shall not exceed pounds per hour when operating at a process weight rate established in the following formula:~~

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

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

(4) IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C, Section D.1.6 and Section D.1.9(a) conditions:

C.16 ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~
Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

~~(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 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 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 timeframe 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 a minor permit modification 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.~~

~~(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.~~

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ **To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3, S4, S5, S6, S7, and S8) while one of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for w~~ **When there is** a noticeable change in overspray emissions, or **when** evidence of overspray emissions is observed. ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ **The Permittee shall take reasonable steps in accordance with Section C- Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, 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 according with Section C-General Record Keeping Requirements, of this permit.

(5) The following Section C.6 Operation of Equipment was removed in order to avoid duplication of requirements contained in the D Section. Also the Table of Content has been modified to reflect these changes.

~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or 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.~~

On October 14, 2005, Armor Metal Group Madison, Inc. submitted comments, on the proposed Part 70 permit, stated that "When the new form GSD10(a) was submitted to provide information about the plasma cutter, a typographic error occurred. Box 45, for the grinding and machine operations, was supposed to be shown as applicable." As the result of the comments, following changes have been make to the Permit:

(1) The following description was added to the A.3 (b) Insignificant activitiess:

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) One (1) flame-cutting station with a maximum metal cutting rate of 12 inches per minute. [326 IAC 6-3]

(b) **Grinding and machining operations controlled with fabric filters, with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]**

(2) The Grinding and machining operations were added to the description in the D.2 Section as follows:

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

(a) One (1) flame-cutting station with a maximum metal cutting rate of 12 inches per minute.

(b) **Grinding and machining operations controlled with fabric filters, with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.**

(3) The Emission Limitation and Standards in D.2.1 has been changed as follows:

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) from the flame-cutting, **grinding and machining** operations shall not exceed the pound per hour emission rate established as E in the following equation:

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	**Armor Metal Group Madison, Inc.**
Source Location:	**1200 Clifty Drive, Madison, Indiana 47250**
County:	**Jefferson**
SIC Code:	**3444**
Operation Permit No.:	**T 077-11597-00007**
Operation Permit Issuance Date:	**May 19, 2000**
Permit Renewal No.:	**077-19848**
Permit Reviewer:	**LRT**

The Office of Air Quality (OAQ) has reviewed a Part 70 operating permit renewal application from Armor Metal Group Madison, Inc. formally Armor Metal Fabrication/William Metal Works, relating to the operation of a metal container manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) container line prime booth, identified as EU-01A, installed in 1960, with a maximum capacity of 976 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, exhausting through Stack S1.

(b) One (1) container line OD booth, identified as EU-01B, installed in 1960, with a maximum capacity of 976 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, installed in 1960, exhausting through Stack S2.

(c) One (1) container line auto booth, identified as EU-01C, installed in 1977, with a maximum capacity of 976 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, installed in 1977, exhausting through Stack S3.

(d) One (1) commercial line prime application and topcoat booth, identified as EU-01D, installed in 1971, with a maximum capacity of 1,116 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, installed in 1971, exhausting through Stacks S4 and S5.

(e) One (1) container line touch-up booth, identified as EU-01E, installed in 1971, with a maximum capacity of 50 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, exhausting through Stack S8.

(f) One (1) commercial line touch-up booth, identified as EU-01F, installed in 1971, with a maximum capacity of 55.8 metal containers per hour, utilizing an air assisted airless spray application system, equipped with dry filters for particulate matter overspray control, exhausting through Stacks S6 and S7.

(g) One (1) stencil area, identified as EU-01G, installed in 1975, with a maximum capacity of 2,092 metal containers per hour, utilizing a brush application method, exhausting through general ventilation.

(h) One (1) glue area, identified as EU-01H, installed in 1975, with a maximum capacity of 403 metal containers per hour, utilizing a brush application method, exhausting through general ventilation.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour; one hundred and sixteen (116) units of burners, each with the heat input of 60,000 BTU/hr.

(b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(c) Fifty (50) stations of welding operations, each with a maximum hourly consumption of 1.20 pound per hour.

(d) One (1) flame-cutting station with a maximum metal cutting rate of 12 inches per minute.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(h) Paved and unpaved roads and parking lots with public access.

Existing Approvals

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

T077-11597-00007, issued on May 19, 2000.

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

Some insignificant units were omitted from the initial application and initial TV permit. Therefore, all insignificant units in this permit renewal reflect the information from GSD-10(a) submitted with the permit application renewal.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 on August 18, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations on pages 1-7.

Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

The source was issued a Part 70 operating permit on May 19, 2000. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)							
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAP (Single)	HAPs (Total)
Surface Coating	25.8	25.8	0.00	100.90	0.00	0.00	20.94 (Xylene)	61.40
Insignificants Activities	0.28	0.38	0.00	2.72	2.60	0.00	0.00	2.03
Total PTE	26.08	26.18	0.00	103.62	2.60	0.00	20.94 (Xylene)	63.43

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(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.

(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.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 for VOC from emission report submitted by Armor Metal Group Madison, Inc. for other pollutants from application supplied HAPs on From GSD-08 of the application.

Pollutant	Actual Emissions (tons/year)
PM	3.90
PM-10	1.95
SO_2	-
VOC	51.0
CO	-
NO_x	-
Toluene	6.06
Xylene	6.30
Ethyl Benzene	0.066
MEK	4.77
Hexamethylene 1,6 Diisocyanate	0.026
Total HAPs	17.2

County Attainment Status

The source is located in Jefferson County.

Pollutant	Status
PM-2.5	Non-attainment
PM-10	attainment
SO_2	attainment
NO_2	attainment
1 hour Ozone	attainment
8 hour Ozone	attainment
CO	attainment
Lead	attainment

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

(b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Jefferson County, Madison Township, as nonattinment for PM2.5. On March 7, 2005 the

Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not petentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guildance to regulate PM10 emissions as surrogate for PM 2.5 emissions pursuant to the Non-attainment New Sources Review requiremnts, See the State Rule Applicablility-Entire Source section.

(c) Jefferson County has been classified as attainment or unclassifiable in Indiana for all other 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.

(d) Fugitive Emissions
Since this type of operation is not one of the 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.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This permit renewal does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for all criteria pollutants:

(1) with the potential to emit before controls equal to or greater than the major source threshold for all criteria pollutants,

(2) that is subject to an emission limitation or standard for all criteria pollutants, and

(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this permit.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

(c) The source is subject to 40 CFR Part 63, subpart MMMM (Natioanl Emission Standards for Hazardous Air Pollutants (NESHAP)-Miscellaneous Metal Parts and Products), 326 IAC 20, because it is a major source of HAPs and applied coatings to the surface of metal parts or products pursuant to 40 CFR 63.3881. A copy of the MACT is available on the

U.S. EPA website, http://www.epa.gov/ttn/atw/misc/miscpg.html. Note that the surface coating operations fall under the "general use" coating subcategory of 40 CFR Part 63, subpart MMMM.

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart MMMM.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification no later than April 2, 2006 that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At the time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrated compliance. In addition, pursuant to 40 CFR Part 63, Subpart MMMM, the Permittee shall submit the:

(1) Applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates speciffied in those sections, except as provided in paragrahs (2) and (3) below.

(2) Initial Notification required by 40 CFR 63.9(b).

(3) Notification of Compliance Status required by 40 CFR 63.9(h). The notification of compliance status must contain the information specified in 40 CFR 63.9(h).

State Rule Applicability – Entire Source

326 IAC 2-2 (PSD)

All facilities were installed prior to 1975 except one auto boot (EU-01C) which was installed in 1977. The source is not one of the twenty-eight source categories and the potential to emit of the source is less than 250 tons per year for all pollutants. Therefore, the source is not a major source under 326 IAC 2-2.

326 IAC 2-4.1 (Major Source of HAPs)

The source is not subject to this rule, because all facilities were constructed prior to July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because is required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program). Pursuant to this rule, the owner/operator of the source must trienually submit an emission statement for the source. The trienual statement must be received by July 1 beginning in 2006 and every three year after that. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in 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 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of one hundred (100) tons per year or more, and not regulated by any other provision of Article 8. Although the potential to emit of the source is greater than 100 tons per year, the operation or the source commenced prior to 1974, therefore, the source is not subject to this provision.

State Rule Applicability – Individual Facilities

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were consturcted on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of twenty-five (25) tons per year or more and no other article 8 rule applies. No facilities, at this source with potential VOC emissions at, or above twenty-five (25) tons per year, were constucted on or after January 1, 1980. Therefore, this rule does not apply.

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

The container line prime and OD coating booths were constucted in 1960, and the auto booth was constructed in 1977. The commercial line prime, topcoat, and touch-up booths were constructed in 1971. The stencil and glue areas were constructed in 1975. Pursuant to 326 IAC 8-2-1, none of these facilities are subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) since they all were constructed prior to January 1, 1980.

40 CFR 52 Subpart P (Particulate Emission Limitations).

Pursuant to 40 CFR 52 Subpart P the particle matter (PM) from the EU-01A, EU-01B, EU-01C, EU-1D, EU-01E, EU-01F and the flame cutting shall be limited by the following:

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

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

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-3-2(d), particulate from the EU-01A, EU-01B, EU-01C, EU-1D, EU-01E, EU-01F and flame cutting station shall be controlled by a dry particulate filter, and the Permittee shall operated the control device in accordance with maunfacturer's specifications.

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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 approporiate corrective actions within a specific time period.

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

Six (6) surface coating facilities, the container line prime booth (EU-01A), OD booth (EU-01B), and auto booth (EU-01C), the commercial line prime booth (EU-01D), topcoat booth (EU-01E), and touch-up booth (EU-01F), have 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 stacks S1 through S8 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 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this metal container manufacturing source shall be subject to the conditions of this Part 70 permit T077-19848-00007.

Appendix A: Emissions Summary (Page 1 0f 7)

Company Name: Armor Metal Group Madison, Inc.
Plant Location: 1200 Clifty Drive, Madison, Indiana 47250
Part 70: T 077-19848-00007
Date: March 7, 2006
Permit Reviewer: LRT

State Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Burners	Surface Coating	Solvent Recycling System	Flame Cutting	Total
PM	0.10	25.80	0.00	0.18	26.08
PM-10	0.20	25.80	0.00	0.18	26.18
SO2	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00	0.00
VOC	0.20	100.90	2.52	0.00	103.62
CO	2.60	0.00	0.00	0.00	2.60
Single HAP	0.00	20.94	0.00	0.00	20.94
Combination of HAPS	0.00	61.40	2.00	0.03	63.43

Total State Potential Emissions based on rated capacity assuming operations at 8,760 hours per year.

Limited Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Burners	Surface Coating	Solvent Recycling System	Flame Cutting	Total
PM	0.10	0.258	0.00	0.18	0.54

Appendix A: Emissions Calculations
(Surface Coating)
Company Name: Armor Metal Group Madison, Inc.
Plant Location: 1200 Clifty Drive, Madison, Indiana 47250
Part 70: T 077-19848-00007
Date: March 7, 2006
Permit Reviewer: LRT

Material (AS APPLIED)	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (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
Container Line																
Prime Booth																
Offwhite Primer Paint	11.10	38.07%	0.00%	38.07%	0.00%	41.09%	0.000730	976.00	4.23	4.23	3.01	72.26	13.19	5.36	13.71	
Epoxy Catalyst	7.51	76.14%	0.00%	76.14%	0.00%	18.99%	0.000200	976.00	5.72	5.72	1.12	26.79	4.89	0.38	40.15	
Red Oxide Primer TT	10.00	47.47%	0.10%	47.37%	0.00%	34.08%	0.000070	976.00	4.74	4.74	0.32	7.77	1.42	0.39	18.53	
Red Oxide Primer P	10.78	35.66%	0.10%	35.56%	0.00%	41.68%	0.000070	976.00	3.83	3.83	0.26	6.29	1.15	0.52	12.26	
Worst Case (Coating + Catalyst)											4.13	99.05	18.08	5.75		
O D Booth																
383 Green Polyurethane	11.31	39.84%	0.00%	39.84%	0.00%	36.42%	0.001010	976.00	4.51	4.51	4.44	106.60	19.45	7.34	16.50	
Polyurethane Catalyst	8.85	25.00%	0.00%	25.00%	0.00%	69.71%	0.000250	976.00	2.21	2.21	0.54	12.96	2.36	1.77	4.23	
Satin Gloss Enamel	9.60	32.75%	0.10%	32.75%	0.00%	47.06%	0.000030	976.00	3.14	3.14	0.09	2.21	0.40	0.21	8.91	
Olive Drab Enamel	11.17	39.62%	0.10%	39.62%	0.00%	40.60%	0.000090	976.00	4.43	4.43	0.39	9.33	1.70	0.65	14.53	
Olive Drab AD Enamel	10.00	40.02%	0.10%	40.02%	0.00%	39.58%	0.000010	976.00	4.00	4.00	0.04	0.94	0.17	0.06	13.48	
Forest Green Enamel	10.51	36.62%	0.10%	39.62%	0.00%	40.81%	0.000001	976.00	4.16	4.16	0.00	0.10	0.02	0.01	13.60	
Polyurethane Aircraft Gray	11.90	97.56%	0.00%	97.56%	0.00%	40.00%	0.000001	976.00	11.61	11.61	0.01	0.27	0.05	0.00	38.70	
Mil-C-Comp B Catalyst	8.90	25.00%	0.00%	25.00%	0.00%	70.00%	0.0000004	976.00	2.23	2.23	0.00	0.02	0.00	0.00	4.24	
Air Dry Enamel	10.77	40.02%	0.10%	39.92%	0.00%	39.58%	0.000491	976.00	4.30	4.30	2.06	49.45	9.02	3.39	14.48	
Worst Case (Coating + Catalyst)											4.98	119.56	21.82	9.12		
Auto Booth																
383 Green Polyurethane	11.31	39.84%	0.00%	39.84%	0.00%	36.42%	0.000337	976.00	4.51	4.51	1.48	35.57	6.49	2.45	16.50	
Polyurethane Catalyst	8.85	25.00%	0.00%	25.00%	0.00%	69.71%	0.000080	976.00	2.21	2.21	0.17	4.15	0.76	0.57	4.23	
Satin Gloss Enamel	9.60	32.75%	0.10%	32.75%	0.00%	47.06%	0.000010	976.00	3.14	3.14	0.03	0.74	0.13	0.07	8.91	
Olive Drab Enamel	11.17	39.62%	0.10%	39.62%	0.00%	40.60%	0.000030	976.00	4.43	4.43	0.13	3.11	0.57	0.22	14.53	
Olive Drab AD Enamel	10.00	40.02%	0.10%	40.02%	0.00%	39.58%	0.000000	976.00	4.00	4.00	0.00	0.01	0.00	0.00	13.48	
Forest Green Enamel	10.51	36.62%	0.10%	36.62%	0.00%	40.81%	0.000000	976.00	3.85	3.85	0.00	0.01	0.00	0.00	12.57	
Polyurethane Aircraft Gray	11.90	97.56%	0.00%	97.56%	0.00%	40.00%	0.000000	976.00	11.61	11.61	0.00	0.03	0.00	0.00	38.70	
Mil-C-Comp B Catalyst	8.90	25.00%	0.00%	25.00%	0.00%	70.00%	0.000000	976.00	2.23	2.23	0.00	0.01	0.00	0.00	4.24	
Air Dry Enamel	10.77	40.02%	0.10%	39.92%	0.00%	39.58%	0.000164	976.00	4.30	4.30	0.69	16.52	3.01	1.13	14.48	
Worst Case (Coating + Catalyst)											1.65	39.72	7.25	3.02		
Solvent																
Williamson 2624	7.41	56.62%	0.00%	56.62%	0.00%	0.00%	0.000640	976.00	4.20	4.20	2.62	62.90	11.48	0.00		
Toluene	7.16	100.00%	0.00%	100.00%	0.00%	0.00%	0.000030	976.00	7.16	7.16	0.21	5.03	0.92	0.00		
Stencil Area																
Semi Gloss Stencil	6.90	35.50%	0.00%	35.50%	0.00%	43.20%	0.000001	2092.00	2.45	2.45	0.00	0.06	0.01	0.00	5.67	
Black Stencil Ink TT	9.00	48.60%	0.00%	48.60%	0.00%	36.30%	0.000001	2092.00	4.37	4.37	0.00	0.11	0.02	0.00	12.05	
Black Zenthane Stencil	10.06	34.58%	0.00%	34.58%	0.00%	48.45%	0.000003	2092.00	3.48	3.48	0.02	0.52	0.10	0.00	7.18	
White Marking Stencil	10.70	41.30%	0.00%	41.30%	0.00%	34.70%	0.000001	2092.00	4.42	4.42	0.01	0.22	0.04	0.00	12.74	
Glue Area																
Fastbond	6.58	83.10%	0.30%	82.80%	0.00%	11.40%	0.000007	403.00	5.45	5.45	0.02	0.37	0.07	0.00	47.79	
Touch Up Booth																
383 Green Polyurethane	11.31	39.84%	0.00%	39.84%	0.00%	36.42%	0.00101000	50.00	4.51	4.51	0.23	5.46	0.9967	0.38	16.50	
Polyurethane Catalyst	8.85	24.90%	0.00%	24.90%	0.00%	70.00%	0.00025000	50.00	2.20	2.20	0.03	0.66	0.1206	0.09	4.20	
Satin Gloss Enamel	9.60	32.75%	0.10%	32.75%	0.10%	47.06%	0.00003000	50.00	3.15	3.14	0.00	0.11	0.0207	0.01	8.91	
Olive Drab Enamel	11.17	39.62%	0.10%	39.62%	0.10%	40.60%	0.00009000	50.00	4.43	4.43	0.02	0.48	0.0872	0.03	14.53	
Olive Drab AD Enamel	10.00	40.02%	0.10%	40.02%	0.10%	39.58%	0.00001000	50.00	4.01	4.00	0.00	0.05	0.0088	0.00	13.48	
Forest Green Enamel	10.51	36.62%	0.10%	36.52%	0.10%	40.81%	0.00001100	50.00	3.84	3.84	0.00	0.05	0.0092	0.00	12.54	
Polyurethane Aircraft Gray	11.90	97.56%	0.00%	97.56%	0.00%	40.00%	0.00000100	50.00	11.61	11.61	0.00	0.01	0.0025	0.00	38.70	
Mil-C-Comp B Catalyst	8.90	25.00%	0.00%	25.00%	0.00%	70.00%	0.00000051	50.00	2.23	2.23	0.00	0.00	0.0002	0.00	4.24	
Air Dry Enamel	10.77	40.02%	0.10%	39.92%	0.00%	39.58%	0.000490	50.00	4.30	4.30	0.11	2.53	0.4614	0.17	14.48	
Worst Case (Coating + Catalyst)											0.255	6.122	1.117	0.467		

Appendix A: Emissions Calculations
(Surface Coating)
Company Name: Armor Metal Group Madision, Inc.
Plant Location: 1200 Clifty Drive, Madison, Indiana 47250
Part 70: T 077-19848-00007
Date: March 7, 2006
Permit Reviewer: LRT

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (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
Commercial Line																
Prime Application & Top Coat Booth																
Offwhite Primer Paint	11.10	38.07%	0.00%	38.07%	0.00%	41.09%	0.000151	1116.00	4.23	4.23	0.71	17.09	3.12	1.27	13.71	
Epoxy Catalyst	7.51	76.14%	0.00%	76.14%	0.00%	18.99%	0.000038	1116.00	5.72	5.72	0.24	5.82	1.06	0.08	40.15	
Red Oxide Primer TT	10.00	47.47%	0.10%	47.37%	0.00%	34.08%	0.000655	1116.00	4.74	4.74	3.46	83.10	15.17	4.20	18.53	
Red Oxide Primer P	10.78	35.66%	0.10%	35.56%	0.00%	41.68%	0.000003	1116.00	3.83	3.83	0.01	0.31	0.06	0.03	12.26	
Aqua Zen Primer	9.65	17.98%	0.00%	17.98%	0.00%	76.42%	0.000027	1116.00	1.74	1.74	0.05	1.25	0.23	0.26	3.03	
Worst Case (Coating + Catalyst)											3.71	88.92	16.23	4.29		
383 Green Polyurethane	11.31	39.84%	0.00%	39.84%	0.00%	36.42%	0.000382	1116.00	4.51	4.51	1.92	46.10	8.41	3.18	16.50	
Flat Black enamel	10.93	27.70%	0.10%	27.70%	0.00%	52.57%	0.000001	1116.00	3.03	3.03	0.00	0.08	0.01	0.01	7.68	
Polywhite Armorthane	10.83	39.20%	0.00%	39.20%	0.00%	43.00%	0.000001	1116.00	4.25	4.25	0.00	0.11	0.02	0.01	13.16	
Urethane Catalyst	8.85	24.90%	0.00%	24.90%	0.00%	70.00%	0.0000004	1116.00	2.20	2.20	0.00	0.02	0.00	0.00	4.20	
Green Polyester Painting	9.51	44.20%	0.00%	44.20%	0.00%	42.00%	0.0000001	1116.00	4.20	4.20	0.00	0.01	0.00	0.00	13.34	
Satin Gloss Enamel	9.60	32.75%	0.10%	32.75%	0.10%	47.06%	0.000030	1116.00	3.15	3.14	0.11	2.53	0.46	0.24	8.91	
Olive Drab Enamel	11.17	39.62%	0.10%	39.62%	0.10%	40.60%	0.000080	1116.00	4.43	4.43	0.40	9.48	1.73	0.66	14.53	
Olive Drab AD Enamel	10.00	40.02%	0.10%	40.02%	0.10%	39.58%	0.000010	1116.00	4.01	4.00	0.04	1.07	0.20	0.07	13.48	
Forest Green Enamel	10.51	36.62%	0.10%	36.52%	0.10%	40.81%	0.000001	1116.00	3.84	3.84	0.00	0.10	0.02	0.01	12.54	
Polyurethane Aircraft Gray	11.90	97.56%	0.00%	97.56%	0.00%	40.00%	0.000001	1116.00	11.61	11.61	0.01	0.31	0.06	0.00	38.70	
Mil-C-Comp B Catalyst	8.90	25.00%	0.00%	25.00%	0.00%	70.00%	0.0000003	1116.00	2.23	2.23	0.00	0.02	0.00	0.00	4.24	
Worst Case (Coating + Catalyst)											1.92	46.13	8.42	3.18		
Touch Up Booth																
383 Green Polyurethane	11.31	39.84%	0.00%	39.84%	0.00%	36.42%	0.00004300	55.80	4.51	4.51	0.01	0.26	0.05	0.02	16.50	
Flat Black enamel	10.93	27.70%	0.10%	27.70%	0.00%	52.57%	0.00000020	55.80	3.03	3.03	0.00	0.00	0.00	0.00	7.68	
Polywhite Armorthane	10.83	39.20%	0.00%	39.20%	0.00%	43.00%	0.00000010	55.80	4.25	4.25	0.00	0.00	0.00	0.00	13.16	
Urethane Catalyst	8.85	24.90%	0.00%	24.90%	0.00%	70.00%	0.00000004	55.80	2.20	2.20	0.00	0.00	0.00	0.00	4.20	
Green Polyester Painting	9.51	44.20%	0.00%	44.20%	0.00%	42.00%	0.00000002	55.80	4.20	4.20	0.00	0.00	0.00	0.00	13.34	
Satin Gloss Enamel	9.60	32.75%	0.10%	32.75%	0.10%	47.06%	0.00000300	55.80	3.15	3.14	0.00	0.01	0.00	0.00	8.91	
Olive Drab Enamel	11.17	39.62%	0.10%	39.62%	0.10%	40.60%	0.00001000	55.80	4.43	4.43	0.00	0.06	0.01	0.00	14.53	
Olive Drab AD Enamel	10.00	40.02%	0.10%	40.02%	0.10%	39.58%	0.00000100	55.80	4.01	4.00	0.00	0.01	0.00	0.00	13.48	
Forest Green Enamel	10.51	36.62%	0.10%	36.52%	0.10%	40.81%	0.00000010	55.80	3.84	3.84	0.00	0.00	0.00	0.00	12.54	
Polyurethane Aircraft Gray	11.90	97.56%	0.00%	97.56%	0.00%	40.00%	0.00000010	55.80	11.61	11.61	0.00	0.00	0.00	0.00	38.70	
Mil-C-Comp B Catalyst	8.90	25.00%	0.00%	25.00%	0.00%	70.00%	0.00000004	55.80	2.23	2.23	0.00	0.00	0.00	0.00	4.24	
Worst Case (Coating + Catalyst)											0.01	0.26	0.05	0.02		
Solvent																
Williamson 2624	7.41	56.62%	0.00%	56.62%	0.00%	0.00%	0.000180	1116.00	4.20	4.20	0.84	20.23	3.69	0.00		
Toluene	7.16	100.00%	0.00%	100.00%	0.00%	0.00%	0.000331	1116.00	7.16	7.16	2.64	63.48	11.58	0.00		
Total Potential Emissions (tons/yr)											**23.03**	**552.67**	**100.86**	**25.83**		
Total Limited Emissions (tons/yr)														**0.258**		

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 ‹ VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr)
Potential VOC Pounds per Day = Pounds o VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs/ 1 day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * (# of hours/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lt Weight % Volatiles) * (1 - Transfer efficiency) * (# of hours/yr) * (1 ton/ 2000 lbs)
Pounds VOC per Gallon of Solids = (lbs/gal) * (weight % organics) / (Volume % solids)/Transfer Efficiency)

Appendix A: Emissions Calculations
(Hazardous Air Pollutants)

Company Name: Armor Metal Group Madison, Inc.
Plant Location: 1200 Clifty Drive, Madison, Indiana 47250
Part 70: T 077-19848-00007
Permit Reviewer: LRT
Date: August 11, 2005

Coating or Solvent	Gal of Mat per unit	Maximum Usage	Annual Usage	Coating or Solvent Density	Annual Wt. of coating or solvent used	Toluene		Xylene		MEK		HMDI		Ethylbenzene		Formaldehyde		Hexane	
						(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)
	(gal/hr)	(unit/hr)	(gal/yr)	(lb/gal)	(lb/yr)														
Container Line																			
Prime Booth																			
Offwhite Primer Paint	0.000730	976.0	6241.3	11.10	69,278.7	0.00%	0.00	5.46%	1.89	4.94%	1.71	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Epoxy Catalyst	0.000200	976.0	1710.0	7.51	12,841.7	4.90%	0.31	5.50%	0.35	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Red Oxide Primer TT	0.000070	976.0	598.5	10.00	5,984.8	0.00%	0.00	25.13%	0.75	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Red Oxide Primer P	0.000070	976.0	598.5	10.78	6,451.6	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Worst Coating							0.31		2.24		1.71		0.00		0.00		0.00		0.0(
O D Booth																			
383 Green Polyurethane	0.001010	976.0	8635.3	11.31	97,664.8	5.80%	2.83	1.26%	0.61	11.98%	5.85	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polyurethane Catalyst	0.000250	976.0	2137.4	8.85	18,916.3	0.00%	0.00	1.25%	0.12	0.00%	0.00	0.70%	0.07	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Satin Gloss Enamel	0.000030	976.0	256.5	9.60	2,462.3	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab Enamel	0.000090	976.0	769.5	11.17	8,595.1	7.00%	0.30	26.00%	1.12	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab AD Enamel	0.000010	976.0	85.5	10.00	855.0	8.89%	0.04	25.60%	0.11	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Forest Green Enamel	0.000001	976.0	8.5	10.51	89.9	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polyurethane Aircraft Gray	0.000001	976.0	8.5	11.90	101.7	5.00%	0.00	5.00%	0.00	10.00%	0.01	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Mil-C-Comp B Catalyst	0.000000	976.0	3.4	8.90	30.4	0.00%	0.00	15.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Air Dry Enamel	0.000491	976.0	4197.9	10.77	45,211.7	10.59%	2.39	24.27%	5.49	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Worst Coating							2.83		5.60		5.85		0.07		0.00		0.00		0.0(
Auto Booth																			
383 Green Polyurethane	0.000337	976.0	2881.3	11.31	32,587.2	5.80%	0.95	1.26%	0.20	11.98%	1.95	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polyurethane Catalyst	0.000080	976.0	684.0	8.85	6,053.2	0.00%	0.00	1.25%	0.04	0.00%	0.00	0.70%	0.02	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Satin Gloss Enamel	0.000010	976.0	85.5	9.60	820.8	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab Enamel	0.000030	976.0	256.5	11.17	2,865.0	7.00%	0.10	26.00%	0.37	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab AD Enamel	0.000000	976.0	0.9	10.00	8.5	8.89%	0.00	25.60%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Forest Green Enamel	0.000000	976.0	0.9	10.51	9.0	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polyurethane Aircraft Gray	0.000000	976.0	0.9	11.90	10.2	5.00%	0.00	5.00%	0.00	10.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Mil-C-Comp B Catalyst	0.000000	976.0	0.9	8.90	7.6	0.00%	0.00	15.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Air Dry Enamel	0.000164	976.0	1402.2	10.77	15,101.3	10.59%	0.80	24.27%	1.83	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Worst Coating							0.95		1.87		1.95		0.02		0.00		0.00		0.0(
Solvent																			
Williamson 2624	0.000640	976.0	5471.8	7.41	40,546.4	11.00%	2.23	6.00%	1.22	27.00%	5.47	0.00%	0.00	1.00%	0.20	0.00%	0.00	0.00%	0.0(
Toluene	0.000030	976.0	256.5	7.16	1,836.5	100.00%	0.92	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Stencil Area																			
Semi Gloss Stencil	0.000001	2092.0	9.2	6.90	63.2	10.00%	0.00	5.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Black Stencil Ink TT	0.000001	2092.0	9.2	9.00	82.5	15.00%	0.01	10.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Black Zenthane Stencil	0.000003	2092.0	55.0	10.06	553.1	0.00%	0.00	2.00%	0.01	0.00%	0.00	0.05%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
White Marking Stencil	0.000001	2092.0	18.3	10.70	196.1	10.00%	0.01	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Glue Area																			
Fastbond	0.000007	403.0	24.7	6.58	162.6	15.00%	0.01	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	15.00%	0.01
Touch Up Booth																			
383 Green Polyurethane	0.001010	50.00	442.4	11.31	5,003.3	0.00%	0.00	1.26%	0.03	11.98%	0.30	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polyurethane Catalyst	0.00025000	50.00	109.5	8.85	969.1	0.00%	0.00	13.00%	0.06	0.00%	0.00	0.20%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Satin Gloss Enamel	0.000030	50.00	13.1	9.60	126.1	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab Enamel	0.000090	50.00	39.4	11.17	440.3	7.00%	0.02	26.00%	0.06	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab AD Enamel	0.000010	50.00	4.4	10.00	43.8	8.89%	0.00	25.60%	0.01	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Forest Green Enamel	0.00001100	50.00	4.8	10.51	50.6	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polyurethane Aircraft Gray	0.00000100	50.00	0.4	11.90	5.2	5.00%	0.00	5.00%	0.00	10.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Mil-C-Comp B Catalyst	0.00000051	50.00	0.2	8.90	2.0	0.00%	0.00	15.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Air Dry Enamel	0.00049000	50.00	214.6	10.77	2,311.5	10.59%	0.12	24.27%	0.28	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Worst Coating							0.12		0.34		0.30		0.00		0.00		0.00		0.0(

Appendix A: Emissions Calculations
(Hazardous Air Pollutants)

Company Name: **Armor Metal Group Madison, Inc.**
Plant Location: **1200 Clifty Drive, Madison, Indiana 47250**
Part 70: **T 077-19848-00007**
Date: **March 7, 2006**
Permit Reviewer: **LRT**

Coating or Solvent	Gal of Mat per unit	Maximum Usage	Annual Usage	Coating or Solvent Density	Annual Wt. of coating or solvent used	Toluene		Xylene		MEK		HMDI		Ethylbenzene		Formaldehyde		Hexane	
						(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)	(Wt. %)	(tons/yr)
	(gal/hr)	(unit/hr)	(gal/yr)	(lb/gal)	(lb/yr)														
Commercial Line																			
Prime App. & Topcoat Booth																			
Offwhite Primer Paint	0.000151	1116.0	1476.2	11.10	16,385.8	0.00%	0.00	5.46%	0.45	4.94%	0.40	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Epoxy Catalyst	0.000038	1116.0	371.5	7.51	2,789.9	4.90%	0.07	5.50%	0.08	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Red Oxide Primer TT	0.000655	1116.0	6403.4	10.00	64,033.8	0.00%	0.00	25.13%	8.05	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Red Oxide Primer P	0.000003	1116.0	29.3	10.78	316.2	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Aqua Zen Primer	0.000027	1116.0	264.0	9.65	2,547.2	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Worst Coating							0.07		8.12		0.40		0.00		0.00		0.00		0.0(
383 Green Polyurethane	0.000382	1116.0	3734.5	11.31	42,237.1	0.00%	0.00	1.26%	0.27	11.98%	2.53	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Flat Black Enamel	0.000001	1116.0	9.8	10.93	106.9	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polywhite Amorthane	0.000001	1116.0	9.8	10.83	105.9	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Urethane Catalyst	0.000000	1116.0	3.9	8.85	34.6	0.00%	0.00	13.00%	0.00	0.00%	0.00	0.20%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Green Polyester Painting	0.000000	1116.0	1.0	9.51	9.3	0.00%	0.00	28.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.30%	0.00	0.00%	0.0(
Satin Gloss Enamel	0.000030	1116.0	293.3	9.60	2,815.5	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab Enamel	0.000080	1116.0	782.1	11.17	8,736.0	7.00%	0.31	26.00%	1.14	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab AD Enamel	0.000010	1116.0	97.8	10.00	977.6	8.89%	0.04	25.60%	0.13	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Forest Green Enamel	0.000001	1116.0	9.8	10.51	102.7	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polyurethane Aircraft Gray	0.000001	1116.0	9.8	11.90	116.3	5.00%	0.00	5.00%	0.00	10.00%	0.01	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Mil-C-Comp B Catalyst	0.000000	1116.0	2.9	8.90	26.1	0.00%	0.00	15.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Worst Coating							0.31		1.14		2.53		0.00		0.00		0.00		0.0(
Touch Up Booth																			
383 Green Polyurethane	0.000043	55.80	21.0	11.31	237.7	0.00%	0.00	1.26%	0.00	11.98%	0.01	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Flat Black Enamel	0.000000	55.80	0.1	10.93	1.1	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polywhite Amorthane	0.000000	55.80	0.0	10.83	0.5	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Urethane Catalyst	0.000000	55.80	0.0	8.85	0.2	0.00%	0.00	13.00%	0.00	0.00%	0.00	0.20%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Green Polyester Painting	0.000000	55.80	0.0	9.51	0.1	0.00%	0.00	28.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.30%	0.00	0.00%	0.0(
Satin Gloss Enamel	0.000003	55.80	1.5	9.60	14.1	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab Enamel	0.000010	55.80	4.9	11.17	54.6	7.00%	0.00	26.00%	0.01	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Olive Drab AD Enamel	0.000001	55.80	0.5	10.00	4.9	8.89%	0.00	25.60%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Forest Green Enamel	0.000000	55.80	0.0	10.51	0.5	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Polyurethane Aircraft Gray	0.00000	55.80	0.0	11.90	0.6	5.00%	0.00	5.00%	0.00	10.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Mil-C-Comp B Catalyst	0.00000	55.80	0.0	8.90	0.2	0.00%	0.00	15.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Worst Coating							0.00		0.01		0.01		0.00		0.00		0.00		0.0(
Solvent																			
Williamson 2624	0.000180	1116.00	1759.7	7.41	13,039.4	11.00%	0.72	6.00%	0.39	27.00%	1.76	0.00%	0.00	1.00%	0.07	0.00%	0.00	0.00%	0.0(
Toluene	0.000331	1116.00	3235.9	7.16	23,169.1	100.00%	11.58	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.0(
Total Potential Emissions (tons/yr)							**20.07**		**20.95**		**20.00**		**0.09**		**0.27**		**0.00**		**0.01**

Annual Usage (ton/yr) = Usage rate (gal/hr) * 8,760 (hrs/yr) * Density (lb/gal) / 2000 (lb/ton)
Air Toxic Tons per Year = Annual Usage (tons/yr) * Weight % Air Toxic

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Armor Metal Group Madison, Inc.
Address City IN Zip: 1200 Clifty Drive, Madison, Indiana 47250
Permit Number: T 077-19848-00007
Reviewer: LRT
Date: March 7, 2006

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(carbon steel)	50	1.2		0.0055	0.0005			0.330	0.030	0.000	0	0.030
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	0.7	12	0.1622	0.0005	0.0001	0.0003	0.082	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.41				0.03
Potential Emissions lbs/day								9.88				0.72
Potential Emissions tons/year								1.80				0.13

METHODOLOGY

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

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

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

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

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

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

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

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: **Armor Metal Group Madison, Inc.**
Plant Location: **1200 Clifty Drive, Madison, Indiana 47250**
Part 70: **T 077-19848-00007**
Permit Reviewer: **LRT**
Date: **March 7, 2006**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
6.96	61.0

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	**see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.2	0.0	0.0	0.2	2.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton