

CERTIFIED MAIL#: 7000 0600 0023 5187 7648

TO: Interested Parties / Applicant

FROM: Felicia A. Robinson
Manager of Environmental Planning
Office of Environmental Services

Re: American Art Clay Company, Inc./ F097-20023-00514

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Indiana Department of Environmental Management (IDEM), I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for review and 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 13-15-7-3 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within fifteen (15) calendar days from the receipt of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA); or
- (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 the following:

- (1) the name and address of the person making the request; and
- (2) the interest of the person making the request; and
- (3) identification of any persons represented by the person making the request; and
- (4) the reasons, with particularity, for the request; and
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Environmental Services (OES), Air Permits, Carmen Bugay of my staff via e-mail at cbugay@indygov.org, or by phone at (317) 327-2512.

Enclosures

May 5, 2005

Certified Mail#: 7000 0600 0023 5187 7648

Mr. Ron Ellis, Plant Manager
American Art Clay Company, Inc.
6060 North Guion Road,
Indianapolis, Indiana 46254

Re: 1st Minor Revision No.: F097-20023-00514
to FESOP No.: F097-18189-00514

Dear Mr. Ellis:

American Art Clay Company, Inc., (AMACO) was issued a Federally Enforceable State Operating Permit (FESOP) on December 9, 2003, for the manufacturing of clay and the assembling of kilns and potters wheels, located at 6060 North Guion Road, Indianapolis, IN 46254. An application was received on December 21, 2004, with additional information received on January 25, 2005 (site visit), January 31, 2005, March 4, March 10, March 14, and April 21, 2005.

Changes are reflected in the Technical Support Document (TSD) on pages 12-23, and as summarized on page one of the permit numbered F097-20023-00514. Of note please find that the emission statement condition (C.18) has been deleted (since AMACO is no longer required to submit an annual emission statement), as per revisions to 326 IAC 2-6 (Emission Reporting) which became effective on March 27, 2004. In addition Marion County has been re-designated by U.S. EPA on June 15, 2004 as nonattainment for the 8-hour ozone standard and for PM 2.5 in 70 Federal Register (FR) 943 dated January 5, 2005; thus, these changes are reflected in the TSD and revised permit. Pursuant to the provisions of 326 IAC 2-8-11.1(e), the minor permit revision is hereby approved. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit numbered F097-20023-00514.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Carmen Bugay of my staff via e-mail at cbugay@indygov.org or by phone at (317) 327-2512.

Sincerely,

Original signed by,

Felicia A. Robinson
Manager of Environmental Planning
Office of Environmental Services

Attachments: Revised permit
Technical Support Document (TSD)
Notice of Decision (NOD)

FAR/cmb

cc: U.S. EPA, Region V
Mindy Hahn, IDEM
Marion County Health Department
Matt Mosier, OES, Air Compliance
OES Files (2)

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT(FESOP)

Indiana Department of Environmental Management OFFICE OF AIR QUALITY and City of Indianapolis Office of Environmental Services (OES)

**American Art Clay Company, Inc.
6060 North Guion Road
Indianapolis, Indiana 46254**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units 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 to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: F 097-18189-00514	
Issued by: Original Signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: December 9, 2003 Expiration Date: December 9, 2008
1st Minor Revision Permit No.: F 097-20023-00514	Conditions modified: A.1, A.2, A.3, B.4, D.1, D.1.1, D.1.2, D.1.4, D.1.5, D.1.6, D.1.7, D.1.9, D.3, D.3.3, D.3.5, D.3.7, Appendix A; Condition added: D.3.6 (Baghouse Inspections); Conditions deleted: C.18 (Emission Statement).
Issued by: Original signed by, Felicia A. Robinson Manager of Environmental Planning Office of Environmental Services	Issuance Date: May 5, 2005

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary source manufacturing clay and assembling kilns and potters wheels.

Authorized individual:	Plant Manager
Source Address:	6060 North Guion Road, Indianapolis, Indiana 46254
Mailing Address:	6060 North Guion Road, Indianapolis, Indiana 46254
General Source Phone:	(317) 244-6871
SIC Code:	3269, 3295, 3499, 3479
Source Location Status:	Marion
	Basic nonattainment for ozone 8-hour standard, and PM-2.5
Source Status:	Attainment for all other criteria pollutants; Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories.

A.2 Emissions Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

Clay Mixing and Fire Brick Cutting

Crude Clay Dept.:

- (a) One (1) clay mixing area identified as EU-03a, receiving approval to construct in 2003, with a maximum capacity of 87,600 tons of dry crude clay per year, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21, and comprised of the following:
 - (1) Two (2) mixer-extruders; and
 - (2) One (1) crude clay bagger.
- (b) One (1) five (5) pound crude clay bag fed mixer, identified as EU-03b (formerly part of EU-01), with a maximum capacity of 3,548 tons of clay per year; with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21;
- (c) One (1) five (5) pound crude clay bag fed mixer, identified as EU-03c, with a maximum capacity of 3,548 tons of clay per year, installed in 2004, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21;

Kiln Dept.:

- (d) One (1) fire brick cutting operation, identified as EU-06, receiving approval to construct in 2003, with a maximum capacity of 100 pounds of fire brick per hour, with particulate emissions controlled by one (1) baghouse, identified as CE-4, exhausting to stack S-12, and comprised of the following:
- (1) Six (6) fire brick cutters;
 - (2) Two (2) fire brick routers;
 - (3) One (1) fire brick shaper; and
 - (4) One (1) fire brick sander.

Crude Clay Dept.:

- (e) Six (6) crude clay storage silos, identified as EU-12, with a maximum capacity of 175,200 tons per year of crude clay, with particulate emissions controlled by four (4) baghouses, identified as IP-2 through IP-5, and exhausting through stacks S-5 through S-8;
- (f) Six (6) in-use silos, identified as EU-13, with a maximum capacity of 87,600 tons per year of clay, with particulate emissions controlled by two (2) baghouses, identified as 1P-7 and IP-8, and exhausting through stacks S-10 and S-11.

Surface Coating

- (g) One (1) kiln paint booth, identified as EU-07, receiving approval to construct in 2003, with a maximum usage of 1.47 gallons per hour, with particulate emissions controlled by fabric filters, identified as CE-5, exhausting to stack S-13.
- (h) One (1) Brent paint booth, identified as EU-08, receiving approval to construct in 2003, with a maximum usage of 4.32 gallons per hour, with particulate emissions controlled by fabric filters, identified as CE-6, exhausting to stack S-14.
- (i) One (1) touch-up process for the Brent paint booth, identified as EU-08(a), receiving approval to construct in 2003, with a maximum usage of 1.12 gallons per hour, with particulate emissions controlled by fabric filters, identified as CE-6, exhausting to stack S-14.

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

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

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-5].
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (d) Natural gas-fired combustion sources with a heat input capacity of less than ten million (10,000,000) British thermal units per hour [326 IAC 6-1-2]:
- (1) One (1) Weil natural gas-fired boiler, identified as EU-11, with a maximum capacity of 1.15 million British thermal units per hour, exhausting to stack S-17.
 - (2) Fifteen space heaters, identified as IA-11, one with a capacity of 2.5 MMBtu/hr, two with a capacity of 0.75 MMBtu/hr and twelve with a capacity of 0.15 MMBtu/hr and all burning only natural gas.

- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-1-2]:
 - (1) One (1) welding operation, identified as IA-8, with a maximum capacity of 1,621 tons of steel per year and 6 tons of welding wire per year, exhausting to general ventilation.
- (f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators 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 6-1-2]:
 - (1) One (1) woodworking operation, identified as IA-7, with a maximum capacity of 136 tons per year, exhausting through dust collectors to general ventilation;
 - (2) One (1) scale/pneumatic blender, identified as IA-12, with a maximum capacity of 87,600 tons per year of crude clay, with particulate emissions controlled by one (1) baghouse, identified as IP-6, and exhausting through stack S-9; and
- (g) Emission units with PM and PM-10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) leaded clay mixing area 1, identified as EU-01a, with a capacity of 800 tons of leaded glaze per year, particulate emissions controlled by a HEPA Filter identified as CE-10, and exhausting internally [326 IAC 6-1-2];
 - (2) Three (3) unleaded glaze mixers in one area identified as EU-01b, with a combined maximum capacity of 2,400 tons of unleaded glaze per year, with particulate emissions controlled by one (1) baghouse identified as CE-1, exhausting to stack S-1 [326 IAC 6-1-2];
 - (3) One (1) Sculpt-a-Mold batch mixer, identified as EU-05, receiving approval to construct in 2003, with a maximum capacity of 915 tons of paper mache powder per year, controlled by one (1) baghouse identified as CE-3, exhausting to stack S-3 [326 IAC 6-1-2];
 - (4) One (1) creastone mixing process, identified as IA-2, with a maximum capacity of 534 tons of creastone per year, controlled by one (1) baghouse identified as CE-3, and exhausting to stack S-3 [326 IAC 6-1-2];
 - (5) Two (2) wet mixers, identified as IA-3, with a maximum capacity of 324 tons per year of chrysler clay or a capacity of 83 tons per year of floral clay, controlled by two (2) baghouses, identified as CE-8 and exhausting to general ventilation [326 IAC 6-1-2];
 - (6) One (1) modeling dough mixing operation, identified as IA-4, with a maximum capacity of 131 tons of flour and salt per year, exhausting to general ventilation [326 IAC 6-1-2];
 - (7) One (1) miscellaneous dry materials repackaging operation, identified as IA-5, with a maximum capacity of 110 tons per year of powder glaze, exhausting to stack S-20 [326 IAC 6-1-2];
 - (8) One (1) Rub-N-Buff solvent mixing operation, identified as IA-9, with a maximum capacity of 84 tons per year of solvent and varnish, exhausting to general ventilation;
 - (9) One (1) Brush-N-Leaf solvent mixing operation, identified as IA-9, with a maximum capacity of 13 tons per year of solvent, exhausting to general ventilation; and

- (10) One (1) printing operation, identified as IA-10, with a maximum capacity of 2.5 tons of ink and washes per year, exhausting to general ventilation.
- (h) Filling drums, pails, or other packaging containers with lubricating oils, waxes, and greases.
- (i) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other filtration equipment.
- (k) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.
- (l) Filter or coalescer media changeout.
- (m) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Crude Clay Dept.:

- (n) One (1) mixing operation, identified as EU-04, [326 IAC 6-1 comprised of one (1) sack dump blender, receiving approval to construct in 2003, with a maximum capacity of 1,500 tons per year of dry clay, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21; [326 IAC 2-8],-[326 IAC 6-1-2].

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

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

- (a) 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 and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through May 10, 2003 and published in the Indiana Register June 1, 2003, unless otherwise indicated in the adoption by reference or in Attachment A. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this

permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.

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

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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 April 15 of each year to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

- (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, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:

- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions

or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Indianapolis Office of Environmental Services
Telephone No.: 317-327-2234 (ask for Air Compliance)
Facsimile No.: 317-327-2274

- (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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or OES determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or OES at least thirty (30) days

in advance of the date this permit is to be reopened, except that IDEM, OAQ or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (2) If IDEM, OAQ and OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and OES 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 and OES any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and OES in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing & Training (BLT) Section), to determine the appropriate permit fee.

B.23 Federally Enforceable State Operating Permit [326 IAC 2-8]

This document shall also become a federally enforceable state operating permit pursuant to 326 IAC 2-8 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), Permit Administration & Development Section and the Indianapolis Office of Environmental Services, Air Compliance.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM and OES.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-8-10 or 326 IAC 2-8-11.1 and 326 IAC 2-2 and an Operation Permit Validation Letter is issued.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from IDEM OAQ and OES, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-8-16(Fees).

B.24 Construction Time Frame

Pursuant to 326 IAC 2-2-8 (Revocation of Permits), the IDEM or OES may revoke this permit to construct if the:

- (a) Construction of source has not begun within eighteen (18) months from the effective date of this permit or if during the construction of the source, work is suspended for a continuous period of eighteen (18) months or more.

The IDEM, OAQ and OES may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.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).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Indianapolis Office of Environmental Services
Enforcement Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

The IDEM Commissioner and OES Administrator 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 IDEM Commissioner or the U. S. EPA.

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented 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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.14 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
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

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

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

- (c) If the ERP is disapproved by IDEM, OAQ and OES 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 and OES 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.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirement.

(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 Operation, Maintenance and Monitoring (OMM) Plan; or
- (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) 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 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ and OES of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and OES 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 and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ and OES may extend the retesting deadline.
- (c) IDEM, OAQ and OES reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES 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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097
- (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, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

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 2-8-4(10)]: Clay Mixing and Fire Brick Cutting

Crude Clay Dept.:

- (a) One (1) clay mixing area identified as EU-03a, receiving approval to construct in 2003, with a maximum capacity of 87,600 tons of dry crude clay per year, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21, and comprised of the following:
 - (1) Two (2) mixer-extruders; and
 - (2) One (1) crude clay bagger.
- (b) One (1) five (5) pound crude clay bag fed mixer, identified as EU-03b (formerly part of EU-01), with a maximum capacity of 3,548 tons of clay per year; with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21;
- (c) One (1) five (5) pound crude clay bag fed mixer, identified as EU-03c, with a maximum capacity of 3,548 tons of clay per year, installed in 2004, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21;

Kiln Dept.:

- (d) One (1) fire brick cutting operation, identified as EU-06, receiving approval to construct in 2003, with a maximum capacity of 100 pounds of fire brick per hour, with particulate emissions controlled by one (1) baghouse, identified as CE-4, exhausting to stack S-12, and comprised of the following:
 - (1) Six (6) fire brick cutters;
 - (2) Two (2) fire brick routers;
 - (3) One (1) fire brick shaper; and
 - (4) One (1) fire brick sander.

Crude Clay Dept.:

- (e) Six (6) crude clay storage silos, identified as EU-12, with a maximum capacity of 175,200 tons per year of crude clay, with particulate emissions controlled by four (4) baghouses, identified as IP-2 through IP-5, and exhausting through stacks S-5 through S-8;
- (f) Six (6) in-use silos, identified as EU-13, with a maximum capacity of 87,600 tons per year of clay, with particulate emissions controlled by two (2) baghouses, identified as IP-7 and IP-8, and exhausting through stacks S-10 and S-11;

Insignificant Activity:

Crude Clay Dept.:

- (n) One (1) mixing operation, identified as EU-04 comprised of one (1) sack dump blender, receiving approval to construct in 2003, with a maximum capacity of 1,500 tons per year of dry clay, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21 [326 IAC 6-1-2];

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

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

D.1.1 PM-10 FESOP Limit [326 IAC 2-8]

The PM-10 emissions from the clay mixing area EU-03a, EU-03b, EU-03c, and EU-04, which exit through stack S-21; shall not exceed 1.94 pounds per hour combined. This limit is equivalent to emissions of 8.50 tons of PM-10 per year from these operations. In addition, the fire brick cutting operation EU-06) PM-10 emissions which exit through S-12, shall not exceed 1.94 pounds per hour. This limit is equivalent to emissions of 8.50 tons of PM-10 per year from this operation. This FESOP limit is structured such that, when including PM-10 emissions from all other operations at the source, source total PM-10 emissions remain less than one hundred (100) tons per year. Compliance with this FESOP limit renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Condition D.1.1 and D.1.2, the baghouses for particulate control (CE-4, CE-9, IP-2 through IP-5, IP-7 and IP-8) shall be in operation and control emissions from EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13 at all times that the EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13 are in operation.

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

D.1.5 Visible Emissions Notations

- (a) Once per day visible emission notations of the Crude Clay Dept. Silo/Baghouses (S-5, S-6, S-7, S-8, S-10, S-11) Kiln Dept. Baghouse (S-12), and Crude Clay Dept. Process Baghouse (S-21), stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13 at least once per day when EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13 are in operation and as stated below:

- (a) For the Crude Clay Dept. Process Baghouse CE-9 (EU-03a, EU-03b, EU-03c and EU-04), the pressure drop across the baghouse should be in the normal manufacturer range of 2.5 to 4.1 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from the permit.
- (b) For the Kiln Dept. Baghouse CE-4 (EU-06), the pressure drop across the baghouse should be in the normal manufacturer range of 3-6 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) For the Crude Clay Dept. Silo/Baghouses IP-2 through IP-5 (EU-12), the pressure drop across the baghouse should be in the "normal" manufacturer range of 1.5-8 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (d) For the Crude Clay Dept. Silo/Baghouses IP-7 and IP-8 (EU-13), the pressure drop across the baghouse should be in the "normal" manufacturer range of 1.5-8 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of the Crude Clay Dept. Silo/Baghouses, the Kiln Dept. Baghouse, and the Crude Clay Dept. Process Baghouse (all bags controlling EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13). Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ and OES of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of once per day visible emission notations of S-5, S-6, S-7, S-8, S-10, S-11, S-12 and S-21 stack exhaust.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records at least once per day, of the total static pressure drop across the baghouses.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.
- (d) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Surface Coating

- (g) One (1) kiln paint booth, identified as EU-07, receiving approval to construct in 2003, with a maximum usage of 1.47 gallons per hour, with particulate emissions controlled by dry filters, identified as CE-5, exhausting to stack S-13.
- (h) One (1) Brent paint booth, identified as EU-08, receiving approval to construct in 2003, with a maximum usage of 4.32 gallons per hour, with particulate emissions controlled by dry filters, identified as CE-6, exhausting to stack S-14.
- (i) One (1) touch-up process for the Brent paint booth, identified as EU-08(a), receiving approval to construct in 2003, with a maximum usage of 1.12 gallons per hour, with particulate emissions controlled by dry filters, identified as CE-6, exhausting to stack S-14.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from EU-07 and EU-08 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.2.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator of the Brent paint booth (EU-08) shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.2.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the Brent paint booth (EU-08) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.2.4 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

The actual VOC emissions of the kiln paint booth (EU-07) are less than fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) are not applicable.

Any change or modification which may increase the actual emissions of VOC to greater than fifteen (15) pounds per day shall be approved by the Office of Air Quality before any such change may occur.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ and OES reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.6 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 S-13 and S-14 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. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation 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 deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.2, and D.2.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with Conditions D.2.2 and D.2.4.
 - (1) The VOC content of each coating material and solvent used less water for EU-08.
 - (2) The amount of coating material and solvent used on daily basis for EU-07.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The daily cleanup solvent usage for EU-07; and
 - (4) The weight of VOC emitted each day for EU-07.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-5].
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (d) Natural gas-fired combustion sources with a heat input capacity of less than ten million (10,000,000) British thermal units per hour [326 IAC 6-1-2]:
 - (1) One (1) Weil natural gas-fired boiler, identified as EU-11, with a maximum capacity of 1.15 million British thermal units per hour, exhausting to stack S-17;
 - (2) Fifteen space heaters, identified as IA-11, one with a capacity of 2.5 MMBtu/hr, two with a capacity of 0.75 MMBtu/hr and twelve with a capacity of 0.15 MMBtu/hr and all burning only natural gas.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-1-2]:
 - (1) One (1) welding operation, identified as IA-8, with a maximum capacity of 1,621 tons of steel per year and 6 tons of welding wire per year, exhausting to general ventilation.
- (f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators 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 6-1-2]:
 - (1) One (1) woodworking operation, identified as IA-7, with a maximum capacity of 136 tons per year, exhausting through dust collectors to general ventilation; and
 - (2) One (1) scale/pneumatic blender, identified as IA-12 with a maximum capacity of 87,600 tons per year of crude clay, with particulate emissions controlled by one (1) baghouse, identified as IP-6, and exhausting through stack S-9.
- (g) Emission units with PM and PM-10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) leaded clay mixing area 1, identified as EU-01a, with a capacity of 800 tons of leaded glaze per year, particulate emissions controlled by a HEPA Filter identified as CE-10, and exhausting internally [326 IAC 6-1-2];
 - (2) Three (3) unleaded glaze mixers in one area identified as EU-01b, with a combined maximum capacity of 2,400 tons of unleaded glaze per year, with particulate emissions controlled by one (1) baghouse identified as CE-1, exhausting to stack S-1 [326 IAC 6-1-2];

(table continued - next page)

SECTION D.3

FACILITY OPERATION CONDITIONS (Continued)

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

- (3) One (1) Sculpt-a-Mold batch mixer, identified as EU-05, receiving approval to construct in 2003, with a maximum capacity of 915 tons of paper mache powder per year, controlled by one (1) baghouse identified as CE-3, and exhausting to stack S-3 [326 IAC 6-1-2];
- (4) One (1) creastone mixing process, identified as IA-2, with a maximum capacity of 534 tons of creastone per year, controlled by one (1) baghouse identified as CE-3, and exhausting to stack S-3 [326 IAC 6-1-2];
- (5) Two (2) wet mixers, identified as IA-3, with a maximum capacity of 324 tons per year of chrysler clay or a capacity of 83 tons per year of floral clay, controlled by two baghouses, identified as CE-8 and exhausting to general ventilation [326 IAC 6-1-2];
- (6) One (1) modeling dough mixing operation, identified as IA-4, with a maximum capacity of 131 tons of flour and salt per year, exhausting to general ventilation [326 IAC 6-1-2];
- (7) One (1) miscellaneous dry materials repackaging operation, identified as IA-5, with a maximum capacity of 110 tons per year of powder glaze, exhausting to stack S-20 [326 IAC 6-1-2];

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

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

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure, which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.2 Volatile Organic Compounds (VOCs) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.3 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the mixing operations (EU-01a, EU-01b), Sculpt-a-Mold batch mixer (EU-05), creastone mixing process (IA-2), wet mixers (IA-3), dough mixing operation (IA-4), repackaging operation (IA-5), mixing operation (IA-6), woodworking operation (IA-7), welding operation (IA-8), silos and scale/pneumatic blender (IA-12) and trimmers, shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.3.4 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(b)(3), the Weil natural gas-fired boiler, EU-11, and the fifteen space heaters, IA-11, each shall not discharge a particulate matter content greater than one-hundredth (0.01) grain per dry standard cubic foot (dscf) when firing natural gas.

Compliance Determination Requirements

D.3.5 Particulate Control

In order to comply with Conditions D.3.3, the baghouses for particulate control shall be in operation and control emissions from mixing operation (EU-01b), wet mixers (IA-3), woodworking operation (IA-7), silos and scale/pneumatic blender (IA-12) and the trimmers, at all times that the EU-01b, IA-3, IA-7, IA-12 and trimmers, are in operation.

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

D.3.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling EU-01b, IA-3, IA-7, IA-12 and trimmers. A baghouse inspection shall be performed within 3 months of redirecting vents to the atmosphere and every 3 months thereafter. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ and OES of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (g) Emission units with PM and PM-10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (8) One (1) Rub-N-Buff solvent mixing operation, identified as IA-9, with a maximum capacity of 84 tons per year of solvent and varnish, exhausting to general ventilation;
 - (9) One (1) Brush-N-Leaf solvent mixing operation, identified as IA-9, with a maximum capacity of 13 tons per year of solvent, exhausting to general ventilation; and
 - (10) One (1) printing operation, identified as IA-10, with a maximum capacity of 2.5 tons of ink and washes per year, exhausting to general ventilation.
- (h) Filling drums, pails, or other packaging containers with lubricating oils, waxes, and greases.
- (i) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other filtration equipment.
- (k) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.
- (l) Filter or coalescer media changeout.
- (m) A laboratory as defined in 326 IAC 2-7-1(21)(D).

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

Emission Limitations and Standards

There are no specific regulations applicable to these facilities.

FORMS

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

and

INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES AIR COMPLIANCE

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: American Art Clay Company, Inc.
Source Address: 6060 North Guion Road, Indianapolis, Indiana 46254
Mailing Address: 6060 North Guion Road, Indianapolis, Indiana 46254
FESOP No.: F097-18189-00514

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

and

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE
2700 South Belmont Ave.
Indianapolis Indiana 46221-2097
Phone: 317-327-2234
Fax: 317-327-2274**

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

Source Name: American Art Clay Company, Inc.
Source Address: 6060 North Guion Road, Indianapolis, Indiana 46254
Mailing Address: 6060 North Guion Road, Indianapolis, Indiana 46254
FESOP No.: F097-18189-00514

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

and

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
 AIR COMPLIANCE**

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

Source Name: American Art Clay Company, Inc.
 Source Address: 6060 North Guion Road, Indianapolis, Indiana 46254
 Mailing Address: 6060 North Guion Road, Indianapolis, Indiana 46254
 FESOP No.: F097-18189-005 14

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input checked="" type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input checked="" type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Mail to: Indiana Department of Environmental Management (IDEM)
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, Indiana 46204

Office of Environmental Services (OES)
Air Permits
2700 South Belmont
Indianapolis, IN 46221-2097

American Art Clay Company, Inc.
6060 North Guion Road
Indianapolis, Indiana 46254

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with American Art Clay Company, Inc., I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of American Art Clay Company, Inc. .
(Company Name)
4. I hereby certify that American Art Clay Company, Inc., 6060 North Guion Road, Indiana, 46254, has constructed the clay and clay products manufacturing source in conformity with the requirements and intent of the construction permit application initially received by the Office of Environmental Services on December 21, 2004, and as permitted pursuant to **1st Minor Permit Revision No. F097-20023-00514** issued on _____
5. If actual construction of the emission units differs from the construction proposed in the application, a document describing these differences is attached.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA

COUNTY OF

Subscribed and sworn to me, a notary public in and for _____ County and State of

Indiana on this _____ day of _____, 20 _____ .

My Commission expires:

Signature

Name (typed or printed)

Attachment A

The following state rules have been adopted by reference by the Indianapolis Air Pollution Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

- (1) 326 IAC 1
- (2) 326 IAC 2-3-1 through 2-3-5;
- (3) 326 IAC 2-4-1 through 2-4-6;
- (4) 326 IAC 2-6-1 through 2-6-4;
- (5) 326 IAC 2-7-1 through 2-7-18, 2-7-20 through 2-7-25;
- (6) 326 IAC 2-8-1 through 2-8-15, 2-8-17 through 2-8-10;
- (7) 326 IAC 2-9-1 through 2-9-14;
- (8) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
- (9) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language "federal, state or local" immediately after the word "by" in 326 IAC 2-11-1);
- (10) 326 IAC 3-1.1-1 through 3-1.1-5;
- (11) 326 IAC 3-2.1-1 through 3-2.1-5;
- (12) 326 IAC 3-3-1 through 3-3-5;
- (13) 326 IAC 4-2-1 through 4-2-2;
- (14) 326 IAC 5-1-1 (a), (b) and c) (5), 5-1-2 (1), (2)(A), (2)c) (4), 5-1-3 through 5-1-5, 5-1-7;
- (15) 326 IAC 6;
- (16) 326 IAC 7-1.1-1 and 7-1.1-2;
- (17) 326 IAC 7-2-1;
- (18) 326 IAC 7-3-1 and 7-3-2;
- (19) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
- (20) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
- (21) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2- 5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
- (22) 326 IAC 8-3-1 through 8-3-7;
- (23) 326 IAC 8-4-1 through 8-4-5, 8-4-6 (a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) Kilo Pascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
- (24) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
- (25) 326 IAC 8-6-1 and 8-6-2;
- (26) 326 IAC 9-1-1 and 9-1-2;
- (27) 326 IAC 10; (adopted January 8, 2004)
- (28) 326 IAC 11-1-1 through 11-1-2;
- (29) 326 IAC 11-2-1 through 11-2-3;
- (30) 326 IAC 11-3-1 through 11-3-6;
- (31) 326 IAC 14-1-1 through 14-1-4;
- (32) 326 IAC 14-2-1 except 40 CFR 61.145;
- (33) 326 IAC 14-3-1;
- (34) 326 IAC 14-4-1;
- (35) 326 IAC 14-5-1;
- (36) 326 IAC 14-6-1;
- (37) 326 IAC 14-7-1;
- (38) 326 IAC 14-8-1 through 14-8-5;
- (39) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
- (40) 326 IAC 20;
- (41) 326 IAC 21;
- (42) 326 IAC 21-1-1 (The adoption states that "or the administrator of OES" is added in (b));
- (43) 326 IAC 22-1-1 (The adoption states that "or the administrator of OES" is added in (b)).

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office Of Environmental Services**

Technical Support Document (TSD) for a minor permit revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	American Art Clay Company, Inc.
Source Location:	6060 North Guion Road, Indianapolis, Indiana 46254
County:	Marion
SIC Code:	3269, 3295, 3499, 3479
Operation Permit No.:	097-18189-00514
1st Minor Permit Revision No.:	097-20023-00514
Permit Reviewer:	Carmen Bugay

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from American Art Clay Company, Inc. relating to the manufacturing of clay and the assembling of kilns and potters wheels.

History and Proposed Changes to Emission Units and Control Devices

On December 21, 2004, American Art Clay Company, Inc. (AMACO) submitted an application to IDEM, OAQ and OES requesting the following:

- Redesignation as an Insignificant Activity of emission unit EU-01 to EU-01a (leaded glaze mixing area), controlled by a new CE-10 (HEPA Filter) exhausting internally; and EU-01b (unleaded glaze mixing area) controlled by baghouse CE-1 and exhausting through stack S-1;
- Moving of one five pound crude clay bag fed mixer from EU-01 and redesignation as EU-03b, controlled by baghouse CE-9, and exhausting to stack S-21;
- Redesignation of emission unit EU-03 to EU-03a, controlled by a new baghouse CE-9, and exhausting through stack S-21;
- Addition of one five pound crude clay bag fed mixer, EU-03c, controlled by new baghouse CE-9, and exhausting through stack S-21;
- Moving of emission unit EU-05 (Sculpt-a-mold) now controlled by baghouse CE-3, and exhausting through stack S-3;
- Moving and Redesignation as an Insignificant Activity of IA-2 Creastone mixing process from EU-01 (next to EU-05), controlled by CE-3, and exhausting through stack S-3;
- Moving of baghouse CE-3 and utilization for EU-05 (Sculpt-a-Mold) and Creastone mixing processes exhausting through S-3;
- EU-04 controlled by new baghouse CE-9 (not CE-7), and exhausting to S-21 (not general ventilation);
- Addition of new baghouse CE-9 controlling EU-03a, EU-03b, and EU-03c and exhausting through stack S-21;
- Removal of baghouse CE-7;
- Removal EU-02 (clay mixing area, including removal and storage of baghouse CE-02), associated In-Use Silo with baghouse (IA-1 and IP-1), two petrolatum 10,000 gallons storage tanks; and
- Dismantling of stacks S-4 (deleted with units IA-1 & IP-1 and EU-02), S-18 and S-19 (EU-05 connected now to CE-3).

Justification for this Minor Revision

Since the source's addition, redesignation, moving, and deletion of the emission units and controls, the source achieved improved process efficiency and overall decrease in particulate matter under unrestricted Potential to Emit (PTE), PM by 10.74 tons/year and PM-10 by 6.91 tons/year, while the limited PTE remained under 100 tons per year (tpy). See **Potential to Emit After Issuance Table** and Appendix A (Emission Calculations). For the pollutant of concern (PM-10), the unrestricted PTE is less than 25 tons per year, therefore a minor revision is approved per 326 Indiana Administrative Code (IAC) 2-8-11.1(e).

Existing Approvals

The source has been operating under the FESOP numbered F097-18189-00514, issued on December 9, 2003.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted emission unit and control equipment:

- EU-03c, one (1) five pound crude clay bag fed mixer, with a maximum capacity of 3,548 tons of clay per year, installed in 2004, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21.

Enforcement Issue

AMACO is not exempt from construction requirements since the new emission unit (EU-03c) does not meet exemption requirements (Potential to Emit before controls is 10.47 for particulate matter, and 8.90 for particulate matter below 10 microns) under 326 IAC 2-1.1-3 (c)(2) and (e)(1)(A); therefore AMACO is required to have prior approval to construct from IDEM, OAQ and OES. The site visit by OES on January 25, 2005 confirmed that the new emission unit (EU-03c) and control devices have been moved and/or constructed, but were not operational pending this permit revision. Therefore,

- (a) IDEM and OES are aware that emission unit 03c has been constructed prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition mentioned above, **Unpermitted Emission Units and Pollution Control Equipment**;
- (b) IDEM and OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stacks Summary (Stacks affected by this minor permit revision)

Stack ID	Operation	Stack Type/Shape	Stack Height (feet)	Stack Dimensions (inches)	Maximum Flow Rate (acfm)	Gas Temperature (°F)
S-21		H/C	12	32	12,000	70
S-4	dismantled					
S-18	dismantled					
S-19	dismantled					
IP-1	dismantled					

Recommendation

The staff recommends to the IDEM Commissioner and OES Administrator that the minor FESOP revision be approved. This recommendation is based on the following facts and conditions:

An administratively complete FESOP application for the purposes of this review was received on December 21, 2004. Additional information was submitted on January 25, 2005, January 31, 2005, March 4, March 10, March 14, and April 21, 2005.

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

Emission Calculations

Appendix A (pages 1 and 2) of this document provides detailed emission calculations. In addition, the calculations submitted by the applicant have been verified and found to be accurate and correct.

Potential To Emit

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.

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 100; less than 250
PM-10	greater than 100; less than 250
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

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

HAPs	Potential to Emit (tons/yr)
Xylene	less than 10
Toluene	less than 10
MEK	less than 10
Manganese	less than 10
all other single HAPs	less than 10
TOTAL	less than 25

Note: Negligible indicates emissions less than 0.01 tons per year.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program). The source will remain a FESOP because the source has limited its emissions below the Title V levels.

- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

(See table - next page)

Process/ Emission unit	Potential to Emit After Issuance (tons/year)							Total HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	Lead	
EU-02 (Clay mixing area) --Removed	0.0	0.0	0	0	0	0		0
EU-03a, EU-03b, EU-03c & EU-04 (Clay Mixing Areas)	51.36*	8.50 (326 IAC 2-8)	0	0	0	0		0
EU-06 (Fire Brick Cutting Operation)	27.03*	8.50 (326 IAC 2-8)	0	0	0	0		0
EU-07 (Kiln Paint Booth)	7.76*	1.56	0	35.24	0	0		5.74
EU-08 (Brent Paint Booth)	36.97*	7.44	0	16.71	0	0		0
EU-08 (a) (Brent Paint Booth Touch-Up Process)	0.96*	0.19	0	17.31	0	0		10.63
EU-12 (six crude clay storage silos)	30.96*	21.6	0	0	0	0		0
EU-13 (six in use silos)	15.48*	13.16	0	0	0	0		0
Total Significant Units	170.52	60.95	0	69.26	0	0		16.37
EU-01a - Leaded Glaze (Clay Mixing Area 1)***	1.58*	1.34	0	0	0	0	0.0009	0
EU-01b - Unleaded Glaze (Clay Mixing Area 1)***	3.94*	3.35	0	0	0	0		0
EU-04 (Mixing Operation)*** (See Significant Units EU-03a, b, c above)	0	0	0	0	0	0		0
EU-05 (Sculpt-a-Mold Batch Mixer; Includes Creastone Mixing Process IA- 2)***	2.45*	1.18	0	0	0	0		0
EU-11 (Weil Natural Gas Fired Boiler)	0.01**	0.04	0.003	0.03	0.42	0.5		Neg.
IA-1 (Storage silos)*** --Removed	0.0	0.0	0	0	0	0		0
IA-3 (Wet Mixers)***	1.06*	0.90	0	0	0	0		0
IA-4 (Dough Mixing Operation)***	0.39*	0.09	0	0	0	0		0
IA-5 (Repackaging Operation)***	0.32*	0.28	0	0	0	0		0
IA-7 (Woodworking Operation)***	0.17*	0.07	0	0	0	0		0
IA-8 (Welding Operation)***	0.22*	0.22	0	0	0	0		0.06
IA-9 (Solvent Mixing)***	0	0	0	2.23	0	0		0.07
IA-10 (Printing)***	0	0	0	1.42	0	0		0
IA-11 (Space Heaters)***	0.19	0.19	0.0147	0.13	2.06	2.45		Neg.
IA-12 (scale / pneumatic blending)***	15.48	13.15	0	0	0	0		0
Total Insignificant Units	25.81	20.81	0.0177	3.81	2.48	2.95	0.0009	0.13
Total PTE After Issuance	196.33 (Less than 250)	81.76 (Less than 100)	0.02 (Less than 100)	73.07 (Less than 100)	2.48 (Less than 100)	2.95 (Less than 100)	0.0009 (Less than 5)	16.50 (Less than 25)

Neg. = Negligible - Note: Emissions less than 0.01 tons per year are considered negligible.

* Note that these units are subject to 326 IAC 6-1-2 that provides a PM limitation of 0.03 grain per dry standard cubic foot.

** Note that this unit is subject to 326 IAC 6-1-2. 326 IAC 6-1-2 provides a PM limitation of 0.01 grain per dry standard cubic foot when firing natural gas.

*** Insignificant activity.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Nonattainment
SO ₂	Maintenance attainment
NO ₂	Attainment
1-Hour Ozone	Maintenance attainment
8-Hour Ozone	Basic nonattainment
CO	Attainment
Lead	Unclassifiable

- (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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard on June 15, 2004. Therefore VOC and NOx emissions were reviewed pursuant to the requirements for Emissions Offset rules under 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM-2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM-2.5 emissions, it has directed states to regulated PM-10 emissions as surrogate for PM-2.5 emissions pursuant to the nonattainment New Source Review (NSR) requirements. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (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.

Federal Rule Applicability

There are no New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this revision. All other units and determinations remain the same as stated in the Technical Support Document (TSD) and operation permit numbered F097-18189-00514.

State Rule Applicability - Entire Source

326 IAC 2-1.1-5 (Air Quality Requirements)

Marion County has been classified as nonattainment for particulate matter less than 2.5 microns (PM-2.5). Until U.S. EPA adopts specific New Source Review rules for PM-2.5 emissions, it has directed states to regulate PM-10 emissions as surrogate for PM-2.5 emissions pursuant to the nonattainment New Source Review (NSR) requirements.

Limited potential emissions for PM-10 are less than 100 tons per year therefore, it is not a major source under nonattainment NSR. New EU-03c uncontrolled PTE is 8.90 tons per year for PM-10 and thus it is not a major modification. In addition, this unit does not effect other processes or emission units at the source.

326 IAC 2-2 (Prevention of Significant Deterioration- PSD)

This source is not one (1) of the twenty-eight (28) listed source categories and has potential emissions less than 250 tons per year of PSD regulated pollutants. Therefore, this source is not major for PSD.

New EU-03c uncontrolled PTE is 8.90 tons per year for PM-10, and 10.47 tons/year for PM, and no PTE for NO_x; therefore, it is not major for PSD. In addition, this unit does not effect other processes or emission units at the source.

326 IAC 2-3 (Emission Offset)

The source is not subject to the requirements of 326 IAC 2-3 (Emission Offset), since the source does not have the potential to emit 100 tons or more per year of volatile organic compounds (VOC) and nitrogen oxides (NO_x) for ozone nonattainment areas (Marion County).

New EU-03c does not have PTE for any NO_x or VOC. This unit does not effect other processes or emission units at the source.

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

This source is not subject to the requirements of 326 IAC 2-4 because this source does not have the potential to emit ten (10) tons per twelve (12) consecutive month period of a single HAP or twenty-five (25) tons per twelve (12) consecutive month period of any combination of HAPs.

326 IAC 2-6 (Emission Statement)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it does not meet the applicability requirements of section 1 under this rule, does not emit 5 or more tons per year (tpy) of lead, is not located in Lake or Porter counties, and does not have a Part 70 Permit under 326 IAC 2-7.

326 IAC 2-8 (FESOP)

FESOP numbered F097-18189-00514 stated that EU-01, EU-02, EU-03 and EU-06 were each limited to 1.94 pounds per hour (lbs/hr) or 8.50 tons per year (tpy).

EU-01 was redesignated as EU-01a, EU-01b and EU-03b (five pound clay bag fed mixer from EU-01). EU-01a and EU-01b became insignificant units based on their uncontrolled potential to emit (PTE) per year. (EU-03b is limited as described below.)

Therefore the limit for EU-01 is no longer necessary. In addition since EU-02 and associated control device and stack were dismantled, the FESOP limit mentioned above was not needed and was removed.

The process previously identified as EU-03 has now been designated as EU-03a. The five pound crude clay bag fed mixer (which was part of EU-01), has been redesignated as EU-03b. A new five pound crude clay bag fed mixer has been designated as EU-03c. All units (EU-03a, EU-03b, and EU-03c); are being incorporated into the FESOP limit.

Furthermore, even though unit EU-04 is classified as an insignificant unit, emissions are controlled through the same baghouse (CE-9) and exhaust through the same stack (S-21) as EU-03a, EU-03b, and EU-03c, and thus EU-04 must be under the 1.94 lbs/hr and 8.5 tpy limit as EU-03a, EU-03b, and EU-03c.

Therefore, in this permit revision, the PM-10 emissions from the clay mixing areas of EU-03a, EU-03b, EU-03c, and the mixing operation (EU-04), shall not exceed 1.94 lbs/hr, combined. This limit is equivalent to emissions of 8.50 tpy of PM-10 from these operations. In addition, PM-10 emissions from fire brick cutting operation (EU-06), shall not exceed 1.94 pounds per hour. This limit is equivalent to emissions of 8.50 tons of PM-10 per year from this operations.

See the table below for a summary of units and FESOP limits:

Old ID: Process/Emission unit	Current ID: Process/Emission unit	FESOP Limit
Significant Units		
EU-01 (Clay Mixing Area 1) One (1) leaded glaze mixer Three (3) unleaded glaze mixers One (1) five (5) pound crude clay bag fed mixer One (1) creastone mixing process, identified as IA-2	EU-01a EU-01b Now EU-03b	Not needed
EU-02 (Clay Mixing Area 2)	Removed	Not needed
EU-03 (Clay Mixing Area 3) Two (2) mixer-extruders One (1) crude clay bagger ----- -----	Now EU-03a Now EU-03b (formerly part of EU-01) EU-03c – new unit	1.94 lbs/;8.5 tpy combined with EU-04
EU-06 (Fire Brick Cutting Operation) Six (6) fire brick cutters Two (2) fire brick routers One (1) fire brick shaper One (1) fire brick sander	No change in ID	1.94 lbs/hr; 8.5 tpy
EU-07 (Kiln Paint Booth)	No change in ID	
EU-08 (Brent Paint Booth)	No change in ID	
EU-08 (a) (Brent Paint Booth Touch-Up Process)	No change in ID	
EU-12 (six crude clay storage silos)	No change in ID	
EU-13 (six in use silos)	No change in ID	
Insignificant Units		
EU-04 (Mixing Operation)	No change in ID	1.94 lbs/hr ;8.5 tpy combined with EU-03a, EU-03b, & EU-03c
EU-05 (Sculpt-a-Mold Batch Mixer) -----	No change in ID Now IA-2 (Creastone); No change in ID	
EU-11 (Weil Natural Gas Fired Boiler)	No change in ID	
IA-1 (Storage silos)	Removed	
IA-3 (Wet Mixers)	No change in ID	
IA-4 (Dough Mixing Operation)	No change in ID	
IA-5 (Repackaging Operation)	No change in ID	
IA-7 (Woodworking Operation)	No change in ID	
IA-8 (Welding Operation)	No change in ID	
IA-9 (Solvent Mixing)	No change in ID	
IA-10 (Printing)	No change in ID	
IA-11 (Space Heaters)	No change in ID	
IA-12 (scale / pneumatic blending)	No change in ID	

This FESOP limit for all emissions units mentioned above is structured such that, when including PM-10 emissions from all other operations, source total PM-10 emissions remain less than one hundred (100) tpy. Compliance with this FESOP limit renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-12 (Nonattainment Area Limitations; Marion County)

This source is not subject to the requirements of 326 IAC 6-1-12 (Marion County) because American Art Clay, Inc. is not specifically listed in this rule.

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

This source is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because it is subject to the requirements of 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations)

State Rule Applicability - Individual Facilities:

326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations)

Applicability for all existing units did not change. The new unit, EU-03c, is subject to 326 IAC 6-1-2 because the source is located in Marion County (which has been designated as nonattainment for the 8-hour ozone standard), and is not specifically listed in 326 IAC 6-1-12. Pursuant to 326 IAC 6-1-2(a), EU-03c shall not discharge a particulate matter content greater than three-hundredths (0.03) grain per dry standard cubic foot.

Testing Requirements

Testing is not required at this time for this source. Compliance with the FESOP limitations will be ensured through use of the particulate control devices. Use of the particulate control devices will also ensure compliance with 326 IAC 6-1-2.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for

enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

1. EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13 have applicable compliance monitoring conditions which are being changed from the requirements of the FESOP numbered F097-18189-00514, to manufacturer specifications at the request of the source as specified below:
 - (a) Once per day visible emissions notations of S-5, S-6, S-7, S-8, S-10, S-11, S-12 and S-21 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.
 - (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13 at least once per shift when EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13 are in operation and as stated below:
 - (1) For the Crude Clay Dept. Process Baghouse CE-9 (EU-03a, EU-03b, EU-03c and EU-04), the pressure drop across the baghouse should be in the "normal" manufacturer range of 2.5 to 4.1 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (2) For the Kiln Baghouse CE-4 (EU-06), the pressure drop across the baghouse should be in the "normal" manufacturer range of 3-6 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (3) For the Crude Clay Dept. Silo/Baghouses IP-2 through IP-5 (EU-12), the pressure drop across the baghouse should be in the "normal" manufacturer range of 1.5-8 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (4) For the Crude Clay Dept. Silo/baghouses IP-7 and IP-8 (EU-13), the pressure drop across the baghouse should be in the "normal" manufacturer range of 1.5-8 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

- (c) An inspection shall be performed each calendar quarter of the Crude Clay Dept. Silo/Baghouses, the Kiln Dept. Baghouse, and the Crude Dept. Process Baghouse (of all bags controlling EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12, and EU-13). All defective bags shall be replaced.
- (d) In the event that bag failure has been observed:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue

only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for EU-03a, EU-3b, EU-3c, EU-04, EU-06, EU-12 and EU-13 must operate properly to ensure compliance with 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations) and 326 IAC 2-8 (FESOP).

2. Baghouse inspection requirements under the D.3 section were inadvertently left out of the operational permit numbered F097-18189-00514. This requirement has now been added to this revision for units EU-01b, IA-3, IA-7, IA-12 and the trimmers.

Conclusion

The operation of this source manufacturing clay and assembling kilns and potters wheels shall be subject to the conditions of the attached proposed FESOP 097-20023-00514.

FESOP permit changes:

The table of contents (TOC) and any references of reporting or notifications to IDEM, OAQ and OES, have been changed to reflect the proper names and addresses.

The following changes are being made to the FESOP permit. These changes are **bolded** and deletions are ~~struck through~~ for emphasis as follows:

SECTION A

SOURCE SUMMARY

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

The Permittee owns and operates a stationary source manufacturing clay and assembling kilns and potters wheels.

Authorized individual:	Plant Manager
Source Address:	6060 North Guion Road, Indianapolis, Indiana 46254
Mailing Address:	6060 North Guion Road, Indianapolis, Indiana 46254
General Source Phone:	(317) 244-6871
SIC Code:	3269, 3295, 3499, 3479
Source Location Status:	Marion
Source Status:	Basic nonattainment for ozone 8-hour standard, and PM-2.5 Attainment for all other criteria pollutants; Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories.

A.2 Emissions Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

Clay Mixing and Fire Brick Cutting

~~(a) One (1) loaded clay mixing area 1, identified as EU-01 one (1) baghouse, identified as GE-1, exhausting to stack S-1, receiving approval to construct in 2003, and comprised of the following:~~

- ~~(1) One (1) loaded glaze mixer, with a maximum capacity of 800 tons of loaded glaze per year;~~

- ~~(2) Three (3) unleaded glaze mixers with a combined maximum capacity of 2,400 tons of unleaded glaze per year;~~
- ~~(3) One (1) five (5) pound crude clay bag fed mixer, with a maximum capacity of 3,548 tons of clay per year; and~~
- ~~(4) One (1) creastone mixing process, identified as IA-2, with a maximum capacity of 534 tons of creastone per year.~~
- ~~(e) One (1) clay mixing area 2, identified as EU-02, receiving approval to construct in 2003, comprised of one (1) Permoplast clay (P-clay) mixer, with a maximum capacity of 5,256 tons per year of dry clay, with particulate emissions controlled by one (1) baghouse, identified as CE-2, exhausting to stack S-2.~~

Crude Clay Dept.:

- ~~(e a) One (1) clay mixing area 3, identified as EU-03a, receiving approval to construct in 2003, with a maximum capacity of 87,600 tons of dry crude clay per year, with particulate emissions controlled by one (1) baghouse, identified as CE-3 9, exhausting to stack S-3 21, and comprised of the following:
 - (1) Two (2) mixer-extruders; and
 - (2) One (1) crude clay bagger.~~
- (b) One (1) five (5) pound crude clay bag fed mixer, identified as EU-03b (formerly part of EU-01), with a maximum capacity of 3,548 tons of clay per year; with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21;**
- (c) One (1) five (5) pound crude clay bag fed mixer, identified as EU-03c, with a maximum capacity of 3,548 tons of clay per year, and installed in 2004, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21;**

Kiln Dept.:

- ~~(d) One (1) fire brick cutting operation, identified as EU-06, receiving approval to construct in 2003, with a maximum capacity of 100 pounds of fire brick per hour, with particulate emissions controlled by one (1) baghouse, identified as CE-4, exhausting to stack S-12, and comprised of the following:
 - (1) Six (6) fire brick cutters;
 - (2) Two (2) fire brick routers;
 - (3) One (1) fire brick shaper; and
 - (4) One (1) fire brick sander.~~

Crude Clay Dept.:

- ~~(e) Six (6) crude clay storage silos, identified as EU-12, with a maximum capacity of 175,200 tons per year of crude clay, with particulate emissions controlled by four (4) baghouses, identified as IP-2 through IP-5, and exhausting through stacks S-5 through S-8;~~
- ~~(f) Six (6) in-use silos, identified as EU-13, with a maximum capacity of 87,600 tons per year of clay, with particulate emissions controlled by two (2) baghouses, identified as IP-7 and IP-8, and exhausting through stacks S-10 and S-11.~~

Surface Coating

- ~~(g) One (1) kiln paint booth, identified as EU-07, receiving approval to construct in 2003, with a maximum usage of 1.47 gallons per hour, with particulate emissions controlled by fabric filters, identified as CE-5, exhausting to stack S-13.~~

- (h) One (1) Brent paint booth, identified as EU-08, receiving approval to construct in 2003, with a maximum usage of 4.32 gallons per hour, with particulate emissions controlled by fabric filters, identified as CE-6, exhausting to stack S-14.
- (i) One (1) touch-up process for the Brent paint booth, identified as EU-08(a), receiving approval to construct in 2003, with a maximum usage of 1.12 gallons per hour, with particulate emissions controlled by fabric filters, identified as CE-6, exhausting to stack S-14.

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

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

- (g) Emission units with PM and PM-10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) **One (1) leaded clay mixing area 1, identified as EU-01a, with a capacity of 800 tons of leaded glaze per year, particulate emissions controlled by a HEPA Filter identified as CE-10, and exhausting internally [326 IAC 6-1-2];**
 - (2) **Three (3) unleaded glaze mixers in one area identified as EU-01b, with a combined maximum capacity of 2,400 tons of unleaded glaze per year, with particulate emissions controlled by one (1) baghouse identified as CE-1, exhausting to stack S-1 [326 IAC 6-1-2];**
 - ~~(4) One (1) mixing operation, identified as EU-04, [326 IAC 6-1-2] comprised of one (1) sack dump blender, constructed in 1970, with a maximum capacity of 1,500 tons per year of dry clay, with particulate emissions controlled by one (1) baghouse, identified as CE-7, exhausting to general ventilation **stack S-21**; [326 IAC 2-8], [326 IAC 6-1-2];~~
 - (3) One (1) Sculpt-a-Mold batch mixer, identified as EU-05, receiving approval to construct in 2003, with a maximum capacity of 915 tons of paper mache powder per year, **controlled by one (1) baghouse identified as CE-3**, exhausting to ~~stacks S-18 and S-19~~ **S-3** [326 IAC 6-1-2];
 - (4) **One (1) creastone mixing process, identified as IA-2, with a maximum capacity of 534 tons of creastone per year, controlled by one (1) baghouse identified as CE-3, and exhausting to stack S-3 [326 IAC 6-1-2];**
 - ~~(2 5) Two (2) wet mixers, identified as IA-3, with a maximum capacity of 324 tons per year of Chrysler clay or a capacity of 83 tons per year of floral clay, ~~exhausting to~~ **controlled by two (2) baghouses**, identified as CE-8 and exhausting to general ventilation [326 IAC 6-1-2];~~
 - ~~(4 6) One (1) modeling dough mixing operation, identified as IA-4, with a maximum capacity of 131 tons of flour and salt per year, exhausting to general ventilation [326 IAC 6-1-2];~~
 - ~~(5 7) One (1) miscellaneous dry materials repackaging operation, identified as IA-5, with a maximum capacity of 110 tons per year of powder glaze, exhausting to stack S-20 [326 IAC 6-1-2];~~
 - ~~(6) Two (2) in-use silos, identified as IA-1, with a maximum capacity of 5,256 tons per year of clay, with particulate emissions controlled by one (1) baghouse, identified as 1P-1, and exhausting through stack S-4 [326 IAC 6-1-2];~~

- (7 8) One (1) Rub-N-Buff solvent mixing operation, identified as IA-9, with a maximum capacity of 84 tons per year of solvent and varnish, exhausting to general ventilation;
- (8 9) One (1) Brush-N-Leaf solvent mixing operation, identified as IA-9, with a maximum capacity of 13 tons per year of solvent, exhausting to general ventilation; and
- (9 10) One (1) printing operation, identified as IA-10, with a maximum capacity of 2.5 tons of ink and washes per year, exhausting to general ventilation.

~~(h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids:~~

- ~~(1) Two (2) storage tanks, storing petrolatum, each with a maximum capacity of 10,000 gallons.~~

- (i h) Filling drums, pails, or other packaging containers with lubricating oils, waxes, and greases.
- (j i) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (k j) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other filtration equipment.
- (l k) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.
- (m l) Filter or coalescer media changeout.
- (n m) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Crude Clay Dept.:

- (n) **One (1) mixing operation, identified as EU-04, [326 IAC 6-1 comprised of one (1) sack dump blender, receiving approval to construct in 2003, with a maximum capacity of 1,500 tons per year of dry clay, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21; [326 IAC 2-8], [326 IAC 6-1-2].**

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

- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State **through May 10, 2003 and published in the Indiana Register June 1, 2003**, unless otherwise indicated in the adoption by reference **or in Attachment A**. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

~~C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]~~

- ~~(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). 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~~

and

~~Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097~~

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

- ~~(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, and OES on or before the date it is due.~~

SECTION D.1

FACILITY OPERATION CONDITIONS

(Table continued - next page)

Facility Description [326 IAC 2-8-4(10)]: Clay Mixing and Fire Brick Cutting

- (a) ~~One (1) clay mixing area 1, identified as EU-01, one (1) baghouse, identified as CE-1, exhausting to stack S-1, receiving approval to construct in 2003, and comprised of the following:~~
- ~~(1) One (1) loaded glaze mixer, with a maximum capacity of 800 tons of loaded glaze per year;~~
 - ~~(2) Three (3) glaze mixers with a combined maximum capacity of 2,400 tons of unloading glaze per year;~~
 - ~~(3) One (1) five (5) pound crude clay bag fed mixer, with a maximum capacity of 3,548 tons of clay per year; and~~
 - ~~(4) One (1) creastone mixing process, identified as IA-2, with a maximum capacity of 534 tons of creastone per year.~~
- (b) ~~One (1) clay mixing area 2, identified as EU-02, receiving approval to construct in 2003, comprised of one (1) Permoplast clay (P-clay) mixer, with a maximum capacity of 5,256 tons per year of dry clay, with particulate emissions controlled by one (1) baghouse, identified as CE-2, exhausting to stack S-2.~~

Crude Clay Dept.:

- (e a) One (1) clay mixing area 3, identified as EU-03a, receiving approval to construct in 2003, with a maximum capacity of 87,600 tons of dry crude clay per year, with particulate emissions controlled by one (1) baghouse, identified as CE-3 9, exhausting to stack S-3 21, and comprised of the following:
- (1) Two (2) mixer-extruders; and
 - (2) One (1) crude clay bagger.
- (b) **One (1) five (5) pound crude clay bag fed mixer, identified as EU-03b (formerly part of EU-01), with a maximum capacity of 3,548 tons of clay per year with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21;**
- (c) **One (1) five (5) pound crude clay bag fed mixer, identified as EU-03c, with a maximum capacity of 3,548 tons of clay per year, installed in 2004, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21;**

Kiln Dept.:

- (d) One (1) fire brick cutting operation, identified as EU-06, receiving approval to construct in 2003, with a maximum capacity of 100 pounds of fire brick per hour, with particulate emissions controlled by one (1) baghouse, identified as CE-4, exhausting to stack S-12, and comprised of the following:
- (1) Six (6) fire brick cutters;
 - (2) Two (2) fire brick routers;
 - (3) One (1) fire brick shaper; and
 - (4) One (1) fire brick sander.

Crude Clay Dept.:

- (e) Six (6) crude clay storage silos, identified as EU-12, with a maximum capacity of 175,200 tons per year of crude clay, with particulate emissions controlled by four (4) baghouses, identified as IP-2 through IP-5, and exhausting through stacks S-5 through S-8;

Facility Description [326 IAC 2-8-4(10)]: Clay Mixing and Fire Brick Cutting (continued)

- (f) Six (6) in-use silos, identified as EU-13, with a maximum capacity of 87,600 tons per year of clay, with particulate emissions controlled by two (2) baghouses, identified as IP-7 and IP-8, and exhausting through stacks S-10 and S-11;

Insignificant Activity

Crude Clay Dept.:

- (n) **One (1) mixing operation, identified as EU-04 comprised of one (1) sack dump blender, receiving approval to construct in 2003, with a maximum capacity of 1,500 tons per year of dry clay, with particulate emissions controlled by one (1) baghouse, identified as CE-9, exhausting to stack S-21 [326 IAC 6-1-2];**

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

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

D.1.1 PM-10 FESOP Limit [326 IAC 2-8]

The PM-10 emissions from the ~~clay mixing area 1 (EU-01), clay mixing area 2 (EU-02), clay mixing area 3 (EU-03a),~~ **EU-03b, EU-03c and EU-04, which exit through stack S-21**, shall not exceed 1.94 pounds per hour, ~~each~~ **combined**. This limit is equivalent to emissions of 8.50 tons of PM-10 per year from ~~each of the these~~ operations. **In addition, the fire brick cutting operation (EU-06) PM-10 emissions which exit through S-12, shall not exceed 1.94 pounds per hour. This limit is equivalent to emissions of 8.50 tons of PM-10 per year from this operation.** This FESOP limit is structured such that, when including PM-10 emissions from all other operations at the source, source total PM-10 emissions remain less than one hundred (100) tons per year. Compliance with this FESOP limit renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from ~~EU-01, EU-02, EU-03a,~~ **EU-03b, EU-03c, EU-04,** EU-06, EU-12 and EU-13 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Condition D.1.1 and D.1.2, the baghouses for particulate control (~~CE-4, CE-2, CE-3,~~ CE-4, **CE-09,** IP-2 through IP-5, IP-7 and IP-8) shall be in operation and control emissions from ~~EU-01, EU-02,~~ EU-03a, **EU-03b, EU-03c, EU-04,** EU-06, EU-12 and EU-13 at all times that the ~~EU-01, EU-02,~~ EU-03a, **EU-03b, EU-03c, EU-04,** EU-06, EU-12 and EU-13 are in operation.

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

D.1.5 Visible Emissions Notations

- (a) Once per ~~shift~~ **day** visible emission notations of **the Crude Clay Dept. Silo/Baghouses S-1, S-2, S-3, (S-5, S-6, S-7, S-8, S-10, S-11), Kiln Dept. Baghouse and (S-12), and Crude Clay Dept. Process Baghouse (S-21)**, stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with ~~EU-01, EU-02, EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13~~ at least once per day when ~~EU-01, EU-02, EU-03a, EU-03b, EU-03c, EU-04, EU-06, EU-12 and EU-13~~ are in operation **as stated below**: ~~When for any one reading the pressure drop across the baghouse is outside the normal range of 5.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

- (a) **For the Crude Clay Dept. Process Baghouse CE-9 (EU-03a, EU-03b, EU-03c, and EU-04), the pressure drop across the baghouse should be in the normal manufacturer range of 2.5 to 4.1 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**
- (b) **For the Kiln Dept. Baghouse CE-4 (EU-06), the pressure drop across the baghouse should be in the normal manufacturer range of 3-6 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**
- (c) **For the Crude Clay Dept. Silo/Baghouses IP-2 through IP-5 (EU-12), the pressure drop across the baghouse should be in the normal manufacturer range of 1.5-8 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

- (d) **For the Crude Clay Dept. Silo/Baghouses IP-7 and IP-8 (EU-13), the pressure drop across the baghouse should be in the normal manufacturer range of 1.5-8 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

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

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter **of the Crude Clay Dept. Silos/Baghouses, the Kiln Dept. Baghouse, and the Crude Clay Dept. Process Baghouse** (of all bags controlling ~~EU-01, EU-02, EU-03a, EU-03b, EU-03c, EU-04~~, EU-06, EU-12 and EU-13). Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of once per ~~shift~~ **day** visible emission notations of ~~S-1, S-2, S-3, S-5, S-6, S-7, S-8, S-10, S-11, and S-12~~ and **S-21** stack exhaust.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain ~~weekly~~ records **at least once per day**, of the total static pressure drop across the baghouses.

SECTION D.3

FACILITY OPERATION CONDITIONS - continued - next page

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

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-5].
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (d) Natural gas-fired combustion sources with a heat input capacity of less than ten million (10,000,000) British thermal units per hour [326 IAC 6-1-2]:
 - (1) One (1) Weil natural gas-fired boiler, identified as EU-11, with a maximum capacity of 1.15 million British thermal units per hour, exhausting to stack S-17;
 - (4 2) Fifteen space heaters, identified as IA-11, one with a capacity of 2.5 MMBtu/hr, two with a capacity of 0.75 MMBtu/hr and twelve with a capacity of 0.15 MMBtu/hr and all burning only natural gas.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-1-2]:
 - (1) One (1) welding operation, identified as IA-8, with a maximum capacity of 1,621 tons of steel per year and 6 tons of welding wire per year, exhausting to general ventilation.
- (f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators 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 6-1-2]:
 - (1) One (1) woodworking operation, identified as IA-7, with a maximum capacity of 136 tons per year, exhausting through dust collectors to general ventilation; and
 - (4 2) One (1) scale/pneumatic blender, identified as IA-12 with a maximum capacity of 87,600 tons per year of crude clay, with particulate emissions controlled by one (1) baghouse, identified as IP-6, and exhausting through stack S-9.
- (g) Emission units with PM and PM-10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) **One (1) leaded clay mixing area 1, identified as EU-01a, with a capacity of 800 tons of leaded glaze per year, particulate emissions controlled by a HEPA Filter identified as CE-10, and exhausting internally [326 IAC 6-1-2];**
 - (2) **Three (3) unleaded glaze mixers in one area identified as EU-01b, with a combined maximum capacity of 2,400 tons of unleaded glaze per year, with particulate emissions controlled by one (1) baghouse identified as CE-1, exhausting to stack S-1 [326 IAC 6-1-2];**
 - ~~(1) One (1) mixing operation, identified as EU-04, [326 IAC 6-1-2] comprised of one (1) sack dump blender, constructed in 1970, with a maximum capacity of 1,500 tons per year of dry clay, with particulate emissions controlled by one (1) baghouse, identified as CE-7, exhausting to general ventilation ; [326 IAC 2-8], [326 IAC 6-1-2];~~

(table continued - next page)

SECTION D.3 FACILITY OPERATION CONDITIONS (Continued)

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

- (3) One (1) Sculpt-a-Mold batch mixer, identified as EU-05, **receiving approval to construct in 2003, constructed in 1965**, with a maximum capacity of 915 tons of paper mache powder per year, **controlled by one (1) baghouse identified as CE-3, and exhausting to stacks S-18 and S-19 stack S-3 [326 AC 6-1-2];**
- (4) **One (1) creastone mixing process, identified as IA-2, with a maximum capacity of 534 tons of creastone per year, controlled by one (1) baghouse identified as CE-3, and exhausting to stack S-3 [326 AC 6-1-2];**
- (2 5) Two (2) wet mixers, identified as IA-3, with a maximum capacity of 324 tons per year of Chrysler clay or a capacity of 83 tons per year of floral clay, ~~exhausting to~~ **controlled by two baghouses, identified as CE-8 and exhausting to general ventilation [326 IAC 6-1-2];**
- (4 6) One (1) modeling dough mixing operation, identified as IA-4, with a maximum capacity of 131 tons of flour and salt per year, exhausting to general ventilation [326 IAC 6-1-2];
- (5 7) One (1) miscellaneous dry materials repackaging operation, identified as IA-5, with a maximum capacity of 110 tons per year of powder glaze, exhausting to stack S-20 [326 IAC 6-1-2];
- (6) ~~Two (2) in-use silos, identified as IA-1, with a maximum capacity of 5,256 tons per year of clay, with particulate emissions controlled by one (1) baghouse, identified as 1P-1, and exhausting through stack S-4 [326 IAC 6-1-2];~~

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

D.3.3 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the mixing operations **(EU-01a, EU-01b)** ~~EU-04~~, Sculpt-a-Mold batch mixer (EU-05), **creastone mixing process (IA-2)**, wet mixers (IA-3), dough mixing operation (IA-4), repackaging operation (IA-5), mixing operation (IA-6), woodworking operation (IA-7), welding operation (IA-8), silos and scale/pneumatic blender (IA-12) **and** trimmers, shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

Compliance Determination Requirements

D.3.5 Particulate Control

In order to comply with Conditions D.3.3, the baghouses for particulate control shall be in operation and control emissions from the mixing operation ~~EU-04~~ **(EU-01b)**, wet mixers (IA-3), woodworking operation (IA-7), silos and scale/pneumatic blender (IA-12) **and the** trimmers, at all times that the **EU-01b, EU-04, IA-3, IA-7, IA-12** and trimmers, are in operation.

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

D.3.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling EU-01b, IA-3, IA-7, IA-12 and trimmers. A baghouse inspection shall be performed within 3 months of redirecting vents to the atmosphere and every 3 months thereafter. Inspections are optional when venting indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.6 7 Broken or Failed Bag Detection

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (g) Emission units with PM and PM-10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (8) One (1) Rub-N-Buff solvent mixing operation, identified as IA-9, with a maximum capacity of 84 tons per year of solvent and varnish, exhausting to general ventilation;
 - (9) One (1) Brush-N-Leaf solvent mixing operation, identified as IA-9, with a maximum capacity of 13 tons per year of solvent, exhausting to general ventilation; and
 - (10) One (1) printing operation, identified as IA-10, with a maximum capacity of 2.5 tons of ink and washes per year, exhausting to general ventilation.
- ~~(h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;~~
 - ~~(1) Two (2) storage tanks, storing petrolatum, each with a maximum capacity of 10,000 gallons.~~
- (i h) Filling drums, pails, or other packaging containers with lubricating oils, waxes, and greases.
- (j i) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (k j) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other filtration equipment.
- (l k) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.
- (m l) Filter or coalescer media changeout.
- (n m) A laboratory as defined in 326 IAC 2-7-1(21)(D).

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

Appendix A: Emissions Calculations

Particulate Emissions

Company Name: American Art Clay Company, Inc.
Address City IN Zip: 6060 N. Guion Road
Permit Number: 097-18189-00514
1st Minor Revision Number: 097-20023-00514
Plt ID: 097-00514
Reviewer/Date: AJH, 10/01/2003
Modified by/Date: Carmen Bugay, 02/07/2005

Unit	Operation	Control Device	Outlet Grain Loading (gr/act)	Air Flow Rate (acfm)	Control Efficiency (%)	PM10 Content (%)	Uncontrolled PM Emissions (ton/yr)	Uncontrolled PM10 Emissions (ton/yr)	Controlled PM Emissions (ton/yr)	Controlled PM10 Emissions (ton/yr)	Lead Uncontrolled Emissions (ton/yr)	Lead Controlled Emissions (ton/yr)		
EU-01a	Clay Mix Area1 (Leaded Glaze)	CE-1	0.0006	2,100	97%	85%	1.58	1.34	0.05	0.04	0.03	0.0009		
EU-01b	Clay Mix Area1 (Unleaded Glaze)	CE-10	0.0005	2,100	99%	85%	3.94	3.35	0.04	0.03				
EU-03a,b,c	Clay Mixing	CE-9	0.00114	12,000	99%	85%	51.36	43.65	0.51	0.44				
& EU-04	(New Crude Clay Bag Fed Mixer included in EU-03a,b,c above)													
EU-05 & IA-2	Sculpt-a-Mold & Creastone	CE-3	0.00056	3,500	97%	48%	2.45	1.18	0.07	0.04				
EU-06	Brick Cutting	CE-4	0.008	2,700	97%	44%	27.03	11.84	0.81	0.36				
IA-3	Wet Mixing	CE-8	0.002	700	90%	85%	0.53	0.45	0.05	0.04				
IA-3	Wet Mixing	CE-8	0.002	700	90%	85%	0.53	0.45	0.05	0.04				

METHODOLOGY

Uncontrolled PM Emissions (ton/yr) = Outlet Grain Loading (gr/act) * Air Flow (acfm) * 60 (min/hr) * 8760 (hr/yr) / 7000 (gr/lb) / 2000 (lb/ton) / (1-Control Efficiency)
 Uncontrolled PM10 Emissions (ton/yr) = Uncontrolled PM Emissions (ton/yr) * PM10 Content (%)
 Controlled PM Emissions (ton/yr) = Uncontrolled PM Emissions (ton/yr) * (1-Control Efficiency)
 Controlled PM10 Emissions (ton/yr) = Uncontrolled PM10 Emissions (ton/yr) * (1-Control Efficiency)
 PM10 Content is from AP-42 Appendix B.2 Table B.2.2, Category 4 for all but the brick cutting. PM10 content for the brick cutting is from AP-42 Appendix B.1, Section 10.5 for belt sanding and P-42 Appendix B.2 Table B.2.2.
 IA-2 (Creastone mixing) emissions are included in emissions from EU-01. (Deleted)

Unit	Operation	Control Device	Maximum Throughput (ton/yr)	Controlled PM Emission Factor (lb/ton)	Controlled PM Emissions (ton/yr)	PM10 Content (%)	Controlled PM10 Emissions (ton/yr)	Control Efficiency (%)	Uncontrolled PM Emissions (ton/yr)	Uncontrolled PM10 Emissions (ton/yr)
IA-1	In-use Silos (Deleted)	IP-1								
EU-12	Crude clay storage silos	IP-2	43,800	0.0106	0.23	24%	0.06	97%	7.74	1.86
EU-12	Crude clay storage silos	IP-3	43,800	0.0106	0.23	85%	0.20	97%	7.74	6.58
EU-12	Crude clay storage silos	IP-4	43,800	0.0106	0.23	85%	0.20	97%	7.74	6.58
EU-12	Crude clay storage silos	IP-5	43,800	0.0106	0.23	85%	0.20	97%	7.74	6.58
IA-12	Scale/Pneumatic Blender	IP-6	87,600	0.0106	0.46	85%	0.39	97%	15.48	13.15
EU-13	In-use Silos	IP-7	43,800	0.0106	0.23	85%	0.20	97%	7.74	6.58
EU-13	In-use Silos	IP-8	43,800	0.0106	0.23	85%	0.20	97%	7.74	6.58

Note: Emission factors from AP-42 Section 11.26-1. They are emission factors after a fabric filter.
 PM10 Content is from AP-42 Figure 11.26-2 for IP-2 and from AP-42 Appendix B.2 Table B.2.2 for the others

METHODOLOGY

Controlled PM Emissions (ton/yr) = Controlled PM Emission Factor (lb/ton) * Maximum Throughput (ton/yr) / 2000 (lb/ton)
 Controlled PM10 Emission (ton/yr) = Controlled PM Emissions (ton/yr) * PM10 Content (%)
 Uncontrolled PM Emissions (ton/yr) = Controlled PM Emission (ton/yr) / (1-Control Efficiency)
 Uncontrolled PM10 Emissions (ton/yr) = Controlled PM10 Emission (ton/yr) / (1-Control Efficiency)

Unit	Operation	Maximum Throughput (ton/yr)	PM Emission Factor (lb/ton)	Uncontrolled PM Emissions (ton/yr)	PM10 Content (%)	Uncontrolled PM10 Emissions (ton/yr)
EU-05 moved)						
(EU-03c)*	(New Crude Clay Bag Fed Mixer)*	3,548	5.9	10.47	85%	8.90
IA-4	Dough Mixing	131	5.9	0.39	24%	0.09
IA-5	Repackaging Operation	110	5.9	0.32	85%	0.28
IA-6	Floral Clay Mixing*	83	5.9	0.24	85%	0.21
IA-7	Woodworking	136	2.5	0.17	44%	0.07

METHODOLOGY

PM10 Content is from AP-42 Figure 11.26-2 for EU-05 and IA-4 and from AP-42 Appendix B.2 Table B.2.2 for IA-5 and IA-6.
 PM10 content for the IA-7 is from AP-42 Appendix B.1, Section 10.5 for belt sanding and AP-42 Appendix B.2 Table B.2.2.
 Uncontrolled PM Emissions (ton/yr) = Maximum Throughput (ton/yr) * PM Emission Factor (lb/ton) / 2000 (lb/ton)
 Uncontrolled PM10 Emissions (ton/yr) = Uncontrolled PM Emissions * PM10 Content (%)
 Note: *Floral Clay Mixing is done on equipment used for Chrysler clay.
 Worst case emissions for all pollutants are when making Chrysler Clay (IA-3).
 Note: *New EU-03c calculations is limited to NSR only and is based on AP-42 emission factors stated above.
 See first table calculations for EU-03a, EU-03b and EU-03c calculations

Appendix A: Emissions Calculations

Summary

Company Name: American Art Clay Company, Inc.
Address City IN Zip: 6060 N. Guion Road
Permit Number: 097-18189-00514
1st Minor Revision Number: 097-20023-00514
Plt ID: 097-00514
Reviewer/Date: AJH, 10/01/2003
Modified by/Date: Carmen Bugay, 02/07/2005

Emission Unit	Stack ID	Unrestricted PTE in tons/year										Limited PTE in tons/year												
		PM	PM-10	SO2	VOC	CO	NOx	Lead	Xylene	MEK	Toluene	Comb HAP	PM	PM-10	SO2	VOC	CO	NOx	Lead	Xylene	MEK	Toluene	Comb HAP	
EU-02 (deleted)	S-2	0	0									0	0											
EU-03a, b, c & EU-04	S-21	51.36	43.65									51.36	8.5											
EU-06	S-12	27.03	11.84									27.03	8.5											
EU-07	S-13	7.76	1.56		35.24							7.76	1.56		35.24					4.76	0.092	0.06		5.74
EU-08	S-14	36.97	7.44		16.71							36.97	7.44		16.71									
EU-08(a)	S-14	0.96	0.19		17.31							0.96	0.19		17.31					1.52	3.04	6.07		10.63
EU-12	S-5 - S-8	30.96	21.6									30.96	21.6											
EU-13	S-10 & S-11	15.48	13.16									15.48	13.16											
Insignificant Activities																								
EU-01a-Leaded	HEPA intnl	1.58	1.34									1.58	1.34							0.0009				
EU-01b-Unleaded	S-1	3.94	3.35									3.94	3.35											
EU-04 (See EU-03a,b,c)	S-21	0.00	0									0.00	0											
EU-05 & IA-2	S-3	2.45	1.18									2.45	1.18											
EU-11	S-17	0.04	0.04	0.003	0.03	0.42	0.5					0.00951	0.01	0.04	0.003	0.03	0.42	0.5						
IA-1-deleted	S-4 & S-9	0	0									0	0											
IA-3	GV	0.53	0.45									0.53	0.45											
IA-3	GV	0.53	0.45									0.53	0.45											
IA-4	GV	0.39	0.09									0.39	0.09											
IA-5	S-20	0.32	0.28									0.32	0.28											
IA-7	GV	0.17	0.07									0.17	0.07											
IA-8	GV	0.22	0.22									0.06	0.22	0.22										0.06
IA-9	GV				2.23							0.07				2.23								0.07
IA-10	GV				1.42										1.42									
IA 11		0.19	0.19	0.0147	0.13	2.06	2.45					0.19	0.19	0.0147	0.13	2.06	2.45							
IA-12		15.48	13.15									15.48	13.15											
TOTAL		196.36	120.25	0.0177	73.07	2.48	2.95	0.03	6.28	3.132	6.13	16.50951	196.33	81.76	0.0177	73.07	2.48	2.95	0.0009	6.28	3.132	6.13	16.5	

GV = General Ventilation